

[Counsel for Plaintiffs are identified
in Plaintiffs' signature blocks]

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA; the STATE OF)
OREGON; the CONFEDERATED TRIBES OF THE)
GRAND RONDE COMMUNITY OF OREGON; the)
CONFEDERATED TRIBES OF SILETZ INDIANS; the)
CONFEDERATED TRIBES OF THE UMATILLA)
INDIAN RESERVATION; the CONFEDERATED TRIBES)
OF THE WARM SPRINGS RESERVATION OF)
OREGON; and the NEZ PERCE TRIBE,)

Plaintiffs,)

v.)

ACF INDUSTRIES, LLC; AIRGAS USA LLC; AIR)
LIQUIDE AMERICA L.P.; ASH GROVE CEMENT)
COMPANY; ASHLAND INC.; BEAZER EAST, INC.;)
BNSF RAILWAY COMPANY; CALBAG METALS CO.;)
CITY OF PORTLAND; ESCO GROUP LLC; EVRAZ INC.)
NA (FKA OREGON STEEL MILLS AND GILMORE)
STEEL); GOULD ELECTRONICS INC.; HAJ, INC.,)
D/B/A CHRISTENSON OIL COMPANY; HERCULES)
LLC; KOPPERS INC.; MCCALL OIL & CHEMICAL)
CORPORATION; MCCALL OIL REAL ESTATE)
COMPANY LLC; MOREC FRONT LLC; GWC)
PROPERTIES, LLC; GWC FRONT, LLC; TANKER)
BASIN LLC; MMGL LLC; NORTHWEST PIPE)
COMPANY (FKA NORTHWEST PIPE & CASING)
COMPANY AND NORTHWEST PIPE AND CASING)
COMPANY); PACIFICORP, AN OREGON)
CORPORATION; PORT OF PORTLAND; PORTLAND)
GENERAL ELECTRIC COMPANY (PGE); PORTLAND)
TERMINAL RAILROAD COMPANY; SCHNITZER)
STEEL INDUSTRIES, INC.; SILTRONIC)
CORPORATION; SULZER PUMPS (US) INC.; and)
VALVOLINE INC.,)

Defendants.)

No. 3:23-cv-1603

COMPLAINT

Plaintiffs United States of America (“United States”), by authority of the Attorney General, on behalf of the National Oceanic and Atmospheric Administration (“NOAA”) of the U.S. Department of Commerce and the U.S. Department of the Interior (“DOI”); the State of Oregon (the “State”); the Confederated Tribes of the Grand Ronde Community of Oregon; the Confederated Tribes of Siletz Indians; the Confederated Tribes of the Umatilla Indian Reservation; the Confederated Tribes of the Warm Springs Reservation of Oregon; and the Nez Perce Tribe (collectively “Plaintiffs”), allege as follows:

I. GENERAL ALLEGATIONS

1. This is a civil action under Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9607(a); Section 311 of the Clean Water Act (CWA), 33 U.S.C. § 1321; Section 1002(b) of the Oil Pollution Act (OPA), 33 U.S.C. § 2702(b); the Oregon Hazardous Waste and Hazardous Materials Act, ORS § 465; and ORS § 468B.060, for damages for injury to, destruction of, or loss of natural resources resulting from the release of hazardous substances and discharges of oil into the Willamette River in and near Portland, Oregon.

II. JURISDICTION AND VENUE

2. This Court has jurisdiction over this case pursuant to Sections 107 and 113(b) of CERCLA, 42 U.S.C. §§ 9607 and 9613(b); Section 311(n) of the CWA, 33 U.S.C. § 1321(n); Section 1017(b) of OPA, 33 U.S.C. § 2717(b); and 28 U.S.C. §§ 1331, 1345 and 1367(a).

3. Venue is proper in this district pursuant to Section 113(b) of CERCLA, 42 U.S.C. § 9613(b); Section 1017(b) of OPA, 33 U.S.C. § 2717(b); and 28 U.S.C. § 1391(b) and (c).

III. PLAINTIFFS

4. Pursuant to Section 107(f) of CERCLA, 42 U.S.C. § 9607(f), Section 1006 of OPA, 33 U.S.C. § 2706, Section 311(f)(5) of the CWA, 33 U.S.C. § 1321(f)(5), and 40 C.F.R. § 300.600, NOAA, on behalf of the U.S. Department of Commerce, is a trustee for certain natural resources that are the subject of this action.

5. Pursuant to Section 107(f) of CERCLA, 42 U.S.C. § 9607(f), Section 1006 of OPA, 33 U.S.C. § 2706, Section 311(f)(5) of the CWA, 33 U.S.C. § 1321(f)(5), and 40 C.F.R. § 300.600, DOI is a trustee for certain natural resources that are the subject of this action.

6. Pursuant to Section 107(f) of CERCLA, 42 U.S.C. § 9607(f), Section 1006 of OPA, 33 U.S.C. § 2706, Section 311(f)(5) of the CWA, 33 U.S.C. § 1321(f)(5), 40 C.F.R. § 300.605, ORS § 465, and ORS § 468B.060, the State is a trustee for certain natural resources that are the subject of this action.

7. Pursuant to Section 107(f) of CERCLA, 42 U.S.C. § 9607(f), Section 1006 of OPA, 33 U.S.C. § 2706, and 40 C.F.R. § 300.610, the Confederated Tribes of the Grand Ronde Community of Oregon is a trustee for certain natural resources that are the subject of this action.

8. Pursuant to Section 107(f) of CERCLA, 42 U.S.C. § 9607(f), Section 1006 of OPA, 33 U.S.C. § 2706, and 40 C.F.R. § 300.610, the Confederated Tribes of Siletz Indians is a trustee for certain natural resources that are the subject of this action.

9. Pursuant to Section 107(f) of CERCLA, 42 U.S.C. § 9607(f), Section 1006 of OPA, 33 U.S.C. § 2706, and 40 C.F.R. § 300.610, the Confederated Tribes of the Umatilla Indian Reservation is a trustee for certain natural resources that are the subject of this action.

10. Pursuant to Section 107(f) of CERCLA, 42 U.S.C. § 9607(f), Section 1006 of OPA, 33 U.S.C. § 2706, and 40 C.F.R. § 300.610, the Confederated Tribes of the Warm Springs Reservation of Oregon is a trustee for certain natural resources that are the subject of this action.

11. Pursuant to Section 107(f) of CERCLA, 42 U.S.C. § 9607(f), Section 1006 of OPA, 33 U.S.C. § 2706, and 40 C.F.R. § 300.610, the Nez Perce Tribe is a trustee for certain natural resources that are the subject of this action.

12. Each trustee for natural resources identified in this section (“Trustee”) is a member of the Portland Harbor Natural Resource Trustee Council (“Trustee Council”). All members of the Trustee Council serve as trustees for the assessment and recovery of damages for injury to, destruction of, loss of and/or loss of use of natural resources and/or the services provided by those resources under their trusteeship.

IV. INJURIES TO NATURAL RESOURCES

13. The Willamette River is a highly industrialized river that flows through Portland, Oregon. As a result of releases of hazardous substances and discharges of oil from facilities located near and adjacent to the Willamette River, the United States Environmental Protection Agency listed the Portland Harbor Superfund Site (the “Site”) on the National Priorities List in 2000. 65 *Fed. Reg.* 75179, 75181 (Dec. 1, 2000).

14. The Willamette River is a “navigable water” within the meaning of Section 1001(21) of OPA, 33 U.S.C. § 2701(21), and Sections 311 and 502(7) of the CWA, 33 U.S.C. §§ 1321 and 1362(7).

15. The Willamette River is contaminated with oil and a variety of hazardous substances, including polycyclic aromatic hydrocarbons (“PAHs”), polychlorinated biphenyls (“PCBs”), cadmium, copper, lead, mercury, tributyltin (“TBT”), bis 2-ethylhexyl phthalate, dichlorodiphenyltrichloroethane (“DDT”), dichlorodiphenyldichloroethylene (“DDE”), dichlorodiphenyldichloroethane (“DDD”), and 4-methyl phenol. Overall, the Trustees have identified the presence of over 45 hazardous substances in the sediments of the Willamette River.

16. Hazardous substances and oil have been and are being released and discharged into the Portland Harbor Natural Resource Damage Assessment Area from properties and/or facilities owned and/or operated by Defendants through direct discharges, other process discharges, storm water discharges, surface water runoff, wastewater discharges, and/or groundwater and/or seep discharges, and those hazardous substances and oil have caused injury to, destruction of, loss of and/or loss of use of natural resources in the Portland Harbor Natural Resource Damage Assessment Area under Plaintiffs' trusteeship, including sediment, invertebrates, fish, wildlife, and other resources that are specifically of tribal importance. Each Trustee and the public have suffered the loss of natural resource services (including ecological services as well as direct and passive human use losses) as a consequence of those injuries.

17. The Trustee Council assessed injuries to natural resources from hazardous substances and oil in the “Portland Harbor Natural Resource Damage Assessment Area,” which includes the waters, shoreline, intertidal areas, and bottom sediments, of the Willamette River,

including Swan Island Lagoon, from approximately River Mile 12.3 to approximately River Mile 0.8 near the confluence with the Columbia River, as well as the upper 1.2 miles of the Multnomah Channel.

V. DEFENDANTS

18. Defendants (including Defendants' predecessors in interest) own and/or operate, or in the past owned and/or operated, real property and/or facilities, identified by tax parcel or other property description for each Defendant in Appendix A of this Complaint. Operations were conducted on Defendants' real property and/or facilities in Appendix A during Defendants' (including Defendants' predecessors') periods of ownership and/or operation as follows:

a. ACF Industries, LLC, is a past and present owner and past operator of the real property and facilities described in Appendix A. Operations on the identified property include: lumber mill operations; rail car repair, cleaning, sandblasting, and painting; metal fabrication and transformer repair; and wooden crate/pallet fabrication. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of diesel; underground storage of leaded gasoline and waste oil; vehicle operations and/or washing; unprotected storage of petroleum contaminated soil; and unprotected storage of spent sandblasting grit.

b. Airgas USA LLC and Air Liquide America L.P. are past and/or present owners and/or operators of the real property and facilities described in Appendix A. Operations on the identified property include: acetylene and hydrogen gas manufacturing and calcium hydroxide manufacturing (a byproduct of the acetylene manufacturing process); production of oxygen and nitrogen; and storage and disposal of non-magnetic auto shredder wastes. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: landfilling of construction and demolition debris, auto shredder wastes, dredged sediments, Doane Lake, and scrap metal; oil/water separation and filtration; petroleum leaks and/or spills; underground storage of heating oil; underground septic tank use; slag storage or landfilling; aboveground storage of naphtha solvent and other petroleum

products; fueling operations; ink manufacturing; lubricating oil use in manufacturing; and scrap metal yard operations.

c. Ash Grove Cement Company is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: lime manufacturing; production of powdered limestone and dolomite; and cement storage and distribution. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of diesel, hydraulic fluid, lubrication oil, waste oil, and other petroleum products; boat moorage or marina operations; cement/limestone manufacturing and/or distribution; use of creosote-treated railroad ties and wood pilings; extensive vehicle operations or washing; landfilling of dredged sediments; PCB capacitor use; PCB contaminated oil spillage; PCB transformer use, spills, and/or storage; petroleum leaks and spills; scrap metal yard operations; underground storage of gasoline; fueling operations; hydraulic oil leaks and spills; and ship maintenance and/or construction.

d. Ashland, Inc., Hercules, LLC, and Valvoline, Inc., collectively are past owners and past and/or present operators of the real property and facilities described in Appendix A. Operations on the identified property include: storage and/or distribution of fatty acids, petroleum products, and car care products; shipping, receiving, blending, and packaging of petroleum products; production and distribution of chemical products used in the paper industry; storage, repackaging, drum washing, and shipment of industrial chemicals, food grade materials, and plastic pellets; and repackaging, blending, and distribution of petroleum products, chemicals, resin, acids, and bases. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: steel manufacturing; petroleum leaks and/or spills; fueling operations; fuel oil use; underground storage of heating oil, diesel, waste oil, gasoline, and other petroleum products; aboveground storage of waste oil and other petroleum products; adhesives production; adhesives waste disposal; extensive vehicle operations; and landfilling of dredged sediments.

e. Beazer East, Inc. is a past operator of the real property and facilities described in Appendix A. Operations on the identified property include: distillation of coal tar to produce chemicals, oil, creosote, and pitch; and terminal operations for the receipt, storage, and distribution of pitch and creosote. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of petroleum products; coal tar distillation plant operations; coal tar pitch distribution; landfilling of coal tar distillates; disposal of coal tar distillation wastewater; oil/water separation and filtration; petroleum leaks and/or spills; and ship berthing.

f. BNSF Railway Company is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: railroad operations and related activities, including passenger and freight transport, freight handling, switching, locomotive fueling, and railroad maintenance. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: use of creosote treated railroad ties; fueling operations; petroleum leaks and spills; fuel oil use; aboveground and underground storage of petroleum products, including underground storage of diesel and Bunker C Fuel; landfilling of dredged sediments; extensive vehicle operations; unprotected storage of petroleum-contaminated soil, paint waste, and lead acid batteries; landfilling of construction and demolition debris; and steel manufacturing.

g. Calbag Metals Company is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: metals recycling operations; wire chopping; outdoor storage of metals; cutting of oversized stainless steel; baling; and metals storage and distribution. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: scrap metal yard operations; oil/water separation and filtration; aboveground storage of waste oil; and extensive vehicle operations.

h. The City of Portland is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: shipbuilding, ship maintenance, and ship berthing; lumber, chain, and steel manufacturing; mill

and machine shop operations; auto repair; metal forging, cleaning, machining, shaping, cutting, and painting; dry dock operations; lumber mill operations; boat ramp operations; fireboat moorage and operations; incinerator operations; landfilling of municipal wastes and incinerator ash; operation of released conveyance system facilities, such as outfalls and combined sewer overflow systems; paving plant operations; concrete handling operations; operation of electrical substations, transformer storage, and transformer repair; roadway operations; storage of de-icing materials; vehicle parking; laboratory operations; rail yard operations and rail car storage; coliseum operations; firefighting training operations; electrical transformer repair; and manufacturing of stone, clay, and glass. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: use of creosote-treated railroad ties and wood pilings; landfilling of dredged sediments; landfilling of construction and demolition debris; municipal landfill operations; ship berthing; ship/boat maintenance and/or construction; aboveground storage of heating oil and other petroleum products; underground storage of diesel, gasoline, heating oil, Bunker C fuel, waste oil, and other petroleum products; petroleum leaks and/or spills; boat moorage; fueling operations; waste transfer station operations; asphalt batch plant operations and/or asphalt production; extensive vehicle operations or washing; unprotected storage of petroleum contaminated soil; mechanical and/or electric motor repair and maintenance; and operation of released conveyance system facilities.

i. ESCO Group LLC is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include operation of two steel foundries and landfilling of used foundry-related waste materials, such as spent sand cores, molds, slag, and refractory materials. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: steel fabrication; industrial landfilling of steel foundry waste; landfilling of Doane Lake; above-ground storage of hydraulic fluid, waste oil, and diesel; underground storage of waste oil, diesel, and gasoline; and fueling operations.

j. EVRAZ Inc. NA is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: steel manufacturing, smelting, recycling, and storage; landfilling of waste materials; pipe coating; steel product and materials cutting, handling, and storage; and storage and repair of seagoing containers and equipment. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of diesel, gasoline, hydraulic fluid, kerosene, and other petroleum products; use of creosote-treated railroad ties and wood pilings; extensive vehicle operations; fueling operations; hydraulic fluid use; hydraulic oil leakage and/or spills; petroleum leaks and/or spills; landfilling of dredged sediments; landfilling of construction and demolition debris; oil/water separation and filtration; PCB-containing capacitor use; PCB transformer use, spills, and/or storage; underground storage of diesel, gasoline, Bunker C fuel, and other petroleum products; steel fabrication; use of lubricating oil in manufacturing; sandblasting (for other than boats or vessels); scrap metal yard operation; slag storage or landfilling; and sump discharges.

k. Gould Electronics Inc. is a past and present owner and past operator of the real property and facilities described in Appendix A. Operations on the identified property include: cable sweating, lead refining, battery breaking, and lead oxide production. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: battery breaking, hydraulic fluid use, landfilling of dredged sediments, landfilling of shredded battery casings, lead smelting and/or refining, and PCB transformer use.

l. HAJ Inc. is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: bulk petroleum blending, mixing, storage, and distribution, particularly lubricating and other specialty oils. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of kerosene, lubrication oil, and other petroleum products; underground storage of diesel and other petroleum products; extensive vehicle operations or washing; hydraulic oil leakage and/or spills; petroleum leaks and/or spills; and unprotected storage of petroleum contaminated soil.

m. Koppers Inc. is a past and present operator of the real property and facilities described in Appendix A. Operations on the identified property include: storage and distribution operations of coal tar pitch and other related products via railroad tank cars or bulk cargo ships. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of petroleum products; coal tar pitch distribution and/or storage; petroleum leaks and/or spills; ship berthing; and extensive vehicle operations or washing.

n. McCall Oil and Chemical Corporation, McCall Oil Real Estate Company LLC, Morec Front LLC, GWC Properties, LLC, GWC Front, LLC, and Tanker Basin LLC collectively are past and/or present owners and past and/or present operators of the real property and facilities described in Appendix A. Operations on the identified property include: marine terminal operations to store, blend, and distribute petroleum products, including asphalt, bunker fuel, marine diesel oil, and diesel fuel; asphalt plant operations; and operation of facilities to store and distribute industrial chemicals. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: asphalt batch plant operations and/or asphalt production; use of creosote treated wood pilings; extensive vehicle operations or washing; fuel oil use; fueling operations; landfilling of dredged sediments; use of lubricating oil in manufacturing; oil/water separation and filtration; petroleum leaks and/or spills; and aboveground storage of chemicals.

o. MMGL LLC is a past and present owner of the real property and facilities described in Appendix A. Operations on the identified property include: petroleum product handling and storage; edible oil storage; tugboat operations; car crushing; container storage; automotive trailer manufacturing; railroad spur operations; dry good storage; trucking and warehousing; truck maintenance and repair; scrap metal storage and recycling; metals recycling; log storage; steel manufacturing; ship repair and dismantling; wood products manufacturing; landfilling; acetylene manufacturing; commercial warehouse operations; wood and steel door fabrication; and commercial PCB-decommissioning. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: use

of creosote-treated wood pilings and railroad ties; landfilling of dredged sediments, auto-shredder residue, construction and demolition debris, and scrap metal; underground storage of diesel, gasoline, hydraulic fluid, heating oil, Bunker C fuel, lubrication oil, waste oil, and other petroleum products; ship berthing; ship/boat maintenance and/or construction; and storage or landfilling of slag.

p. Northwest Pipe Company is a past and present owner and past and present operator of the real property and facilities described in Appendix A. Operations on the identified property include steel pipe manufacturing; metals scrap yard operations; and storage of steel pipe and coal tar cylinders. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: steel fabrication; uncovered coal and/or coal tar storage; sandblasting (for other than boats or vessels); PCB transformer use; PCB-contaminated oil spill(s); landfilling of dredged sediments; underground storage of gasoline; and aboveground storage of diesel, gasoline, hydraulic oil, waste oil, and other petroleum products.

q. PacifiCorp is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include operation of an electrical distribution network (including poles, vaults, underground cables, submerged cables, transmission lines, transformers, and substations) and vehicle and equipment maintenance, repair, and storage. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: petroleum leaks and/or spills; storage or transporting of PCB-contaminated materials; PCB transformer use, spills, and/or storage; mechanical and/or electrical motor repair and/or maintenance; storage of lead batteries; underground storage of gasoline, kerosene, and diesel; aboveground storage of waste oil; use of creosote-treated utility poles; fueling operations; oil/water separation and filtration; and mercury spill(s).

r. Portland General Electric Company is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: power plant operations; operation of an electrical distribution network (including poles,

vaults, underground cables, submerged cables, transmission lines, transformers, and substations); and vehicle and equipment maintenance, repair, and storage. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of diesel; underground storage of heating oil; use of creosote-treated railroad ties and wood pilings; fueling operations; gas turbine power generation; landfilling of dredged sediment; PCB capacitor use; PCB transformer use; PCB oil spill(s); petroleum leaks and/or spills; oil/water separation and filtration; and storage of PCB-contaminated material.

s. Port of Portland is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: shipping terminal operations; shipbuilding and ship repair; airport operations; storage of materials, chemicals, and petroleum products; concrete mixing; stormwater and process water storage and treatment; vehicle parking and staging; sediment dredging; dock maintenance and repair; and vessel birthing. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: use of creosote-treated railroad ties and wood pilings; landfilling of construction and demolition debris, used sandblast grit, dredged sediments, and Doane Lake; petroleum leaks and/or spills; underground storage of diesel, gasoline, heating oil, waste oil, and other petroleum products; aboveground storage of diesel, gasoline, kerosene, lubrication oil, heating oil, Bunker C fuel, bilge water, waste oil, and other petroleum products; operation of unprotected petroleum sumps; coal and/or coal tar pitch storage and/or distribution; hydraulic fluid use; hydraulic oil leakage and/or spills; PCB capacitor use; PCB transformer use, spills, and/or storage; petroleum leaks and/or spills; slag storage or landfilling; extensive vehicle operations or washing; ship berthing; ship/boat maintenance and/or construction; fueling operations; application/disposal of pesticides; ballast water storage/treatment; fuel oil use; sandblasting (for other than boats or vessels); unprotected storage of spent sandblasting grit; wood preservative use; and contaminant releases from sunken ships.

t. Portland Terminal Railroad Company is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: railcar switching; locomotive servicing and fueling; railcar loading; and storage of empty railway cars. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: extensive vehicle operations (railyard); burning waste and/or debris; fueling operations; use of creosote-treated railroad ties; unprotected storage of petroleum-contaminated soil; hydraulic oil use, leakage, and/or spills; unprotected storage of spent sandblasting grit; unprotected storage of paint waste; aboveground storage of diesel, heating oil, and other petroleum products; underground storage of diesel, gasoline, heating oil, Bunker C fuel, kerosene, lubrication oil, waste oil, and other petroleum products; petroleum leaks and/or spills; fueling operations; disposal of liquid manufactured gas plant waste; coal gasification plant/refinery operations; and steel fabrication.

u. Schnitzer Steel Industries, Inc. is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include: metals recycling; steel fabrication and distribution and storage of steel products, parts, and equipment; final ship assembly; ship dismantling; automobile recycling; landfilling auto shredder residue; operation of a machining, welding, and repair shop; warehousing; and truck terminal operations, including painting and repairs. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of hydraulic fluid, diesel, gasoline, waste oil, and other petroleum products; underground storage of gasoline, diesel, hydraulic fluid, lubrication oil, and other petroleum products; oil/water separation and filtration; auto-shredder residue generation and/or storage and landfilling; use of creosote-treated railroad ties and wood pilings; extensive vehicle operations; landfilling of dredged sediments; petroleum leaks and/or spills; scrap metal yard operations; ship berthing and dismantling; steel fabrication; storage of lead batteries; dissemination of lead; and mechanical and/or electric motor repair and maintenance.

v. Siltronic Corporation is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include

manufacture of hyper-pure silicon wafers. Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of diesel, waste oil, and other petroleum products; generation of hazardous waste; landfilling of dredged sediments; oil/water separation and filtration; PCB-containing capacitor use; PCB transformer use, spills, and/or storage; and petroleum leaks and/or spills.

w. Sulzer Pumps (US) Inc. is a past and present owner and operator of the real property and facilities described in Appendix A. Operations on the identified property include pump manufacturing, pump refurbishing, and other manufacturing and repair activities.

Activities or occurrences on the property that may have resulted in releases of hazardous substances and/or discharges of oil include: aboveground storage of diesel, waste oil, and other petroleum products; underground storage of diesel, gasoline, hydraulic fluid, heating oil, waste oil, and other petroleum products; use of creosote-treated railroad ties and wood pilings; extensive vehicle operations and washing; landfilling of dredged sediments; locomotive maintenance and/or manufacturing; painting boats or marine vessels; PCB transformer use, spills, and/or storage; pump manufacturing and/or refurbishing; ship berthing; ship/boat maintenance and/or construction; slag storage or landfilling; steel fabrication; unprotected storage of spent sandblast grit; and petroleum leaks and/or spills.

19. The properties identified in Paragraph 18 of this Complaint are facilities within the meaning of Section 101(9) of CERCLA, 42 U.S.C. § 9601(9), and ORS § 465.200(13).

20. During Defendants' ownership and operations of the real properties and facilities identified in Paragraph 18 of this Complaint, hazardous substances and/or oil were released and discharged to the Willamette River through direct discharges, other process discharges, storm water discharges, surface water runoff, wastewater discharges, and/or groundwater or seep discharges. Discharges were to "navigable waters" or "adjoining shorelines" within the meaning of Section 1002(a) of OPA, 33 U.S.C. § 2702(a), and Section 311(b)(3) of the CWA, 33 U.S.C. § 1321(b)(3), and to "waters of the state" within the meaning of ORS §468B.005(10). Hazardous substances released from these properties and facilities and found in the sediments of the Portland Harbor Natural Resource Damage Assessment Area include, but are not limited to,

PAHs, PCBs, cadmium, copper, lead, mercury, TBT, bis 2-ethylhexyl phthalate, DDT, DDE, DDD, and 4-methyl phenol.

VI. FIRST CLAIM FOR RELIEF

21. Plaintiffs reallege paragraphs 1 through 20.

22. Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), provides in pertinent part, as follows:

Notwithstanding any other provision or rule of law, and subject only to the defenses set forth in subsection (b) of this section (1) the owner and operator of a vessel or a facility, (2) any person who at the time of disposal of any hazardous substance owned or operated any facility at which such hazardous substances were disposed of, ...shall be liable for, . . . (C) damages for injury to, destruction of, or loss of natural resources, including the reasonable costs of assessing such injury, destruction, or loss resulting from such a release; . . .

23. Materials disposed of and released in the Willamette River by Defendants include, but are not limited to, PAHs, PCBs, cadmium, copper, lead, mercury, TBT, bis 2-ethylhexyl phthalate, DDT, DDE, DDD, and 4-methyl phenol, which are hazardous substances within the meaning of Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).

24. The properties and facilities owned and operated, or formerly owned and operated, by Defendants, identified in Paragraph 18 of this Complaint, are facilities within the meaning of Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

25. Releases of hazardous substances, including but not limited to PAHs, PCBs, cadmium, copper, lead, mercury, TBT, bis 2-ethylhexyl phthalate, DDT, DDE, DDD, and 4-methyl phenol, have occurred in the Willamette River within the meaning of Sections 101(22) of CERCLA, 42 U.S.C. § 9601(22). The releases of these hazardous substances into the Willamette River from the facilities owned and operated, or formerly owned and operated, by Defendants have resulted in injury to, destruction of, or loss of natural resources within the trusteeship of one or more of the Plaintiffs.

26. Defendants are each a person within the meaning of Section 107 of CERCLA, 42 U.S.C. § 9607.

27. Defendants are jointly and severally liable to Plaintiffs for natural resource damages resulting from releases of hazardous substances pursuant to Section 107(a)(4)(C) of CERCLA, 42 U.S.C. § 9607(a)(4)(C).

VII. SECOND CLAIM FOR RELIEF

28. Plaintiffs reallege paragraphs 1 through 27.

29. Section 1002(a) of OPA, 33 U.S.C. § 2702(a), provides in pertinent part, as follows:

Notwithstanding any other provision or rule of law, and subject to the provisions of this Act, each responsible party for a vessel or a facility from which oil is discharged, or which poses the substantial threat of a discharge of oil, into or upon the navigable waters or adjoining shorelines or the exclusive economic zone is liable for the removal costs and damages specified in subsection (b) of this section that result from such incident.

30. Section 1002(b)(2)(A) of OPA, 33 U.S.C. § 2702(b)(2)(A), makes responsible parties liable for:

Damages for injury to, destruction of, loss of, or loss of use of, natural resources, including the reasonable costs of assessing the damage, which shall be recoverable by a United States trustee, a State trustee, an Indian Tribe trustee, or a foreign trustee.

31. The properties and facilities owned and operated, or formerly owned and operated, by the Defendants identified in Paragraph 18 of this Complaint are facilities within the meaning of Sections 1001(9) and 1002 of OPA, 33 U.S.C. §§ 2701(9) and 2702.

32. Section 1001(32) of OPA, 33 U.S.C. § 2701(32), makes owners and operators of onshore facilities responsible parties for damages resulting from the discharge of oil from those facilities.

33. The discharge of oil into the Willamette River or adjoining shorelines from the facilities owned and operated, or formerly owned and operated, by the Defendants identified in Paragraph 18 of this Complaint resulted in injury to, destruction of, or loss of natural resources within the trusteeship of one or more of the Plaintiffs. These were discharges of oil within the meaning of Section 1001(23) of OPA, 33 U.S.C. § 2701(23).

34. The Defendants identified in Paragraph 18 of this Complaint are jointly and severally liable to Plaintiffs for natural resource damages resulting from discharges of oil pursuant to Section 1002 of OPA, 33 U.S.C. § 2702.

VIII. THIRD CLAIM FOR RELIEF

35. Plaintiffs the United States and the State of Oregon reallege paragraphs 1 through 34.

36. Section 311(b)(3) of the CWA, 33 U.S.C. § 1321(b)(3), provides in pertinent part, as follows:

The discharge of oil or hazardous substances (i) into or upon the navigable waters of the United States, adjoining shorelines, or into or upon the waters of the contiguous zone . . . or which may affect natural resources belonging to, appertaining to, or under the exclusive management authority of the United States . . . in such quantities as may be harmful as determined by the President under paragraph (4) of this subsection, is prohibited

37. Section 311(f)(2) of the CWA, 33 U.S.C. § 1321(f)(2), provides in pertinent part, as follows:

Except where an owner or operator of an onshore facility can prove that a discharge was caused solely by (A) an act of God, (B) an act of war, (C) negligence on the part of the United States Government, or (D) an act or omission of a third party without regard to whether an such act or omission was or was not negligent, or any combination of the foregoing clauses, such owner or operator of any such facility from which oil or a hazardous substance is discharged in violation of subsection (b)(3) of this section shall be liable to the United States Government for the actual costs incurred under subsection (c) of this section for the removal of such oil or substance by the United States Government

38. Section 311(f)(4) of the CWA, 33 U.S.C. § 1321(f)(4), provides in pertinent part, as follows:

The costs of removal of oil or a hazardous substance for which the owner or operator of a vessel or onshore or offshore facility is liable under subsection (f) of this section shall include any costs or expenses incurred by the Federal Government or any State government in the restoration or replacement of natural resources damaged or destroyed as a result of a discharge of oil or a hazardous substance in violation of subsection (b) of this section.

39. The properties and facilities owned and operated, or formerly owned and operated, by Defendant, identified in Paragraph 18 of this Complaint, are onshore facilities within the meaning of Section 311(f)(1) of the CWA, 33 U.S.C. § 1321(f)(1).

40. There have been discharges of oil and hazardous substances, within the meaning of Section 311(a)(1) & (14) of the CWA, 33 U.S.C. § 1321(a)(1) & (14), in harmful quantities into the Willamette River and adjoining shorelines from the facilities.

41. Discharges of oil and hazardous substances from the facilities into the Willamette River or adjoining shorelines have affected, damaged, or destroyed natural resources belonging to, appertaining to, or under the exclusive management authority of the United States.

42. Defendants are jointly and severally liable to the United States and State of Oregon for natural resource damages resulting from discharges of oil and hazardous substances into the Willamette River or adjoining shorelines pursuant to Section 311(f) of the CWA, 33 U.S.C. § 1321(f).

IX. FOURTH CLAIM FOR RELIEF

43. Plaintiff the State of Oregon realleges paragraphs 1 through 42.

44. ORS § 465.255(a), provides in pertinent part as follows:

(1) (1) The following persons shall be strictly liable for those remedial action costs incurred by the state or any other person that are attributable to or associated with a facility and for damages for injury to or destruction of any natural resources caused by a release:

(a) Any owner or operator at or during the time of the acts or omissions that resulted in the release.

(b) Any owner or operator who became the owner or operator after the time of the acts or omissions that resulted in the release, and who knew or reasonably should have known of the release when the person first became the owner or operator.

(c) Any owner or operator who obtained actual knowledge of the release at the facility during the time the person was the owner or operator of the facility and then subsequently transferred ownership or operation of the facility to another person without disclosing such knowledge.

(d) Any person who, by any acts or omissions, caused, contributed to or exacerbated the release, unless the acts or omissions were in material compliance with applicable laws, standards, regulations, licenses or permits.

45. Releases to the Willamette River from the properties owned and operated, or formerly owned and operated, by Defendants, identified in Paragraph 18 of this Complaint, include hazardous substances within the meaning of ORS § 465.200(16).

46. The properties and facilities identified in Paragraph 18 of this Complaint are facilities within the meaning of ORS § 465.200(13).

47. Releases of hazardous substances have occurred in the Willamette River within the meaning of ORS § 465.200(22).

48. Defendants' releases of hazardous substances that have occurred constitute "pollution" within the meaning of ORS § 468B.005(5).

49. The natural resources that have been and continue to be injured, destroyed, or lost by the release of hazardous substances from the facilities owned or operated, or formerly owned or operated, by the Defendants include fish, invertebrates, birds, sediments, and other such natural resources.

50. The State of Oregon has incurred and continues to incur costs related to the assessment of injury to natural resources caused by the releases of hazardous substances from the facilities owned or operated, or formerly owned or operated, by the Defendants identified in Paragraph 18 of this Complaint.

51. Pursuant to ORS § 465.255 and ORS § 468B.060, Defendants are strictly liable, jointly and severally, to the State of Oregon for all damages to natural resources in the Willamette River, resulting from the release of hazardous substances at or from the Defendants' owned and operated, or formerly owned and operated, facilities.

X. REQUEST FOR RELIEF

WHEREFORE, Plaintiffs request that this Court enter judgment against Defendants jointly and severally:

(1) For damages for injury to natural resources resulting from the discharges of oil or releases of hazardous substances into the Willamette River (including its waters, shoreline, intertidal areas, and bottom sediments), including the cost of assessing such damages; and

(2) Awarding Plaintiffs such other and further relief as this Court may deem appropriate.

Dated: November 1, 2023

UNITED STATES OF AMERICA

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COMMUNITY OF OREGON

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PORTLAND HARBOR COMPLAINT

APPENDIX A

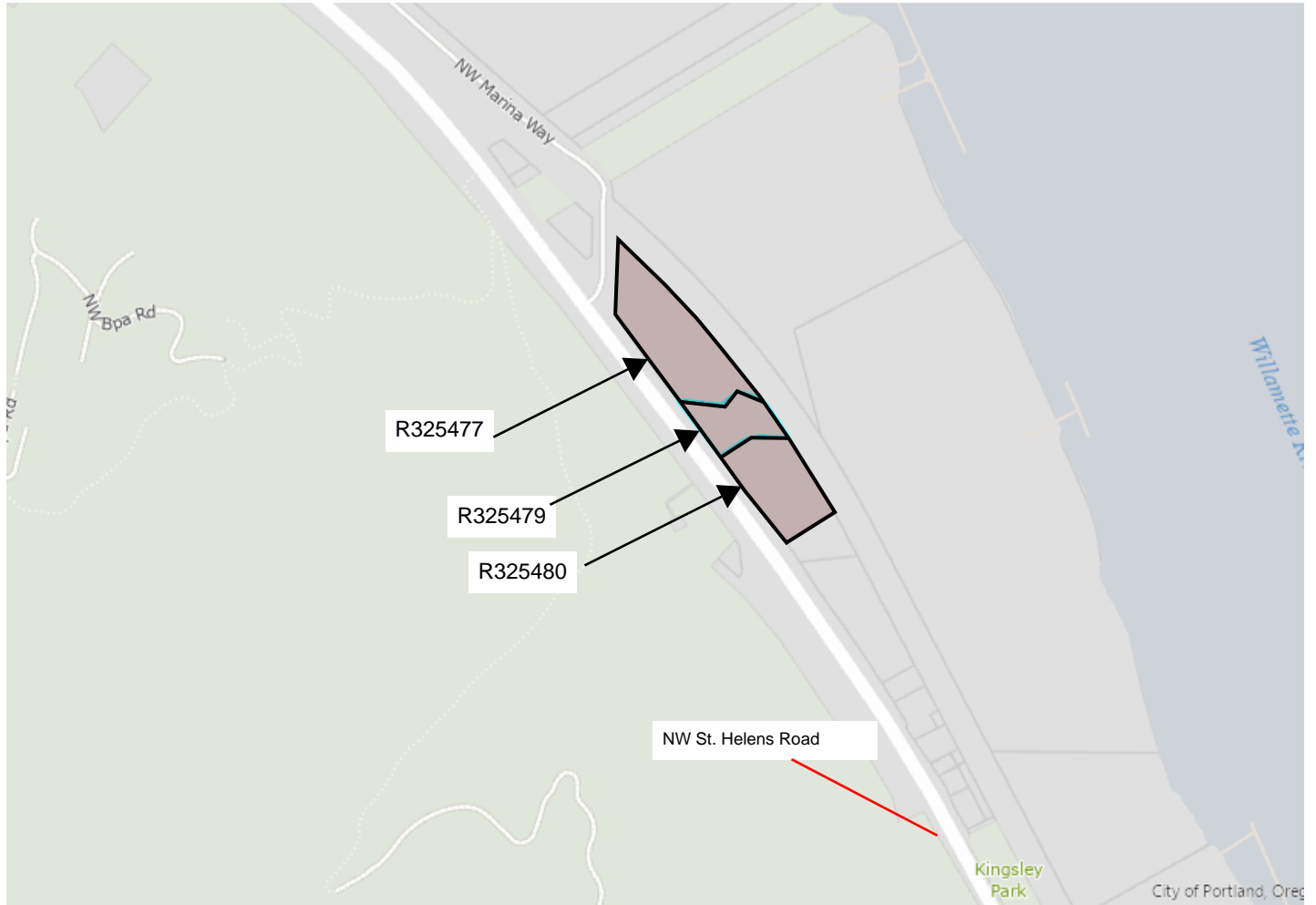
Appendix A – ACF Industries LLC

The properties listed below are identified for ACF Industries LLC for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

| Site ID number | Street Address | Assessor's Parcel Number | Alt Account Number | Notes |
|-----------------------|--------------------------|---------------------------------|---------------------------|------------------|
| 68 | 12160 NW St. Helens Road | R325480 | R971340300 | See attached map |
| 68 | 12160 NW St. Helens Road | R325479 | R971340290 | See attached map |
| 68 | 12160 NW St. Helens Road | R325477 | R971340230 | See attached map |

Map Showing Area of Tax Parcels

ACF Industries, 12160 NW St. Helens Road, Portland, OR



Property outline accessed from Multnomah County Oregon Property Records website 13 July 2021:

https://www.portlandmaps.com/detail/property/NW-ST-HELENS-RD/R325477_did/

Appendix A – Air Liquide America L.P. and Airgas USA LLC

The properties listed below are identified for Air Liquide America L.P. and Airgas USA LLC for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

| Site ID | Street Address | County Tax Parcel ID |
|----------------|--|--|
| 141 | 6529 NW Front Avenue | R961130330 |
| 203 | 3208 NW Yeon Avenue 3330 NW Yeon Avenue | R649701500 R941291430 R649701460 R941291710 R649701480 R941280950 R941291700 |
| 608 | 4959 NW Front Street | R941190500 |
| 639 | 2233 NW 23rd Avenue | R215300400 R215300420 |

Appendix A – Ash Grove Cement Company

The properties listed below are identified for **Ash Grove Cement Company** for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

| Site ID number | Street Address | County Tax Parcel ID | Notes |
|----------------|--------------------------|--|--|
| Site 21 | 13939 N. Rivergate Blvd. | R325200 (alternate account no.: R971260190) R646099 (alternate account no.: R971260191) | Includes the docks identified in the attached map. |
| Site 275 | 3737 N. Port Center Way | R316054 (alternate account no.: R941210770) R237739 (alternate account no.: R649729850) R646339 (alternate account no.: R649729801) R646340 (alternate account no.: R941210771) <i>Inactive former ID numbers, cancelled into R316054:</i> R316051 (alternate account no.: R941210750) R316011 (alternate account no.: R941210330) R316000 (alternate account no.: R941210150) | Includes the docks identified in the attached map. |
| Site 275 | 2700 N. Port Center Way | R237733 (alternate account no.: R649729800) | Includes the docks identified in the attached map. |



Site 21 – 13939 N. Rivergate Blvd.



Site 275 – 3737 N. Port Center Way



Site 275 – 2700 N. Port Center Way

Appendix A – Beazer East, Inc.

The properties listed below are identified for Beazer East, Inc. for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

| Site ID number | Street Address | Assessor's Parcel Number | Alt Account Number | Notes |
|-----------------------|-------------------------|---------------------------------|---------------------------|--------------|
| 123 | 7540 NW St. Helens Road | R502592 | R961130540 | See Figure 1 |
| 123 | 7540 NW St. Helens Road | R324213 | R961130410 | See Figure 1 |
| 123 | 7540 NW St. Helens Road | R324113 | R961120420 | See Figure 1 |
| 123 | 7540 NW St. Helens Road | R324165 | R961121230 | See Figure 1 |
| 123 | 7540 NW St. Helens Road | R324160 | R961121130 | See Figure 1 |
| 123 | 7540 NW St. Helens Road | R324172 | R961121310 | See Figure 1 |
| 123 | 7540 NW St. Helens Road | R324159 | R961121120 | See Figure 1 |
| 123 | 7540 NW St. Helens Road | R324171 | R961121300 | See Figure 1 |
| 123 | 7540 NW St. Helens Road | R324170 | R961121290 | See Figure 1 |



Appendix A-Identification of BNSF Railway Company Properties

The locations and extent of BNSF Railway Company (BNSF) properties, including historical and current ownership and/or operations areas, are identified in this Appendix A for this Complaint. Identification is made by both (1) tax parcel numbers from the Multnomah County Department of County Management Assessment and Taxation to the extent applicable, and (2) as contained within the green defined locations on the referenced attached Maps 1-3 on pages 4-6 below, which also encompass some locations that do not necessarily have tax parcel numbers (for example, the BNSF Railroad Bridge and certain current streets areas). Where certain property areas have had changes in tax numbers due to transactions or redevelopment, both current and former tax parcel numbers are listed where known for clarity. The listed Site ID numbers are numbers which were designated by the Trustees and have been included for reference. The boundaries of some Site ID locations contained in Map 3 no longer exactly conform to current tax numbers for reasons noted above regarding changes in applicable tax numbers.

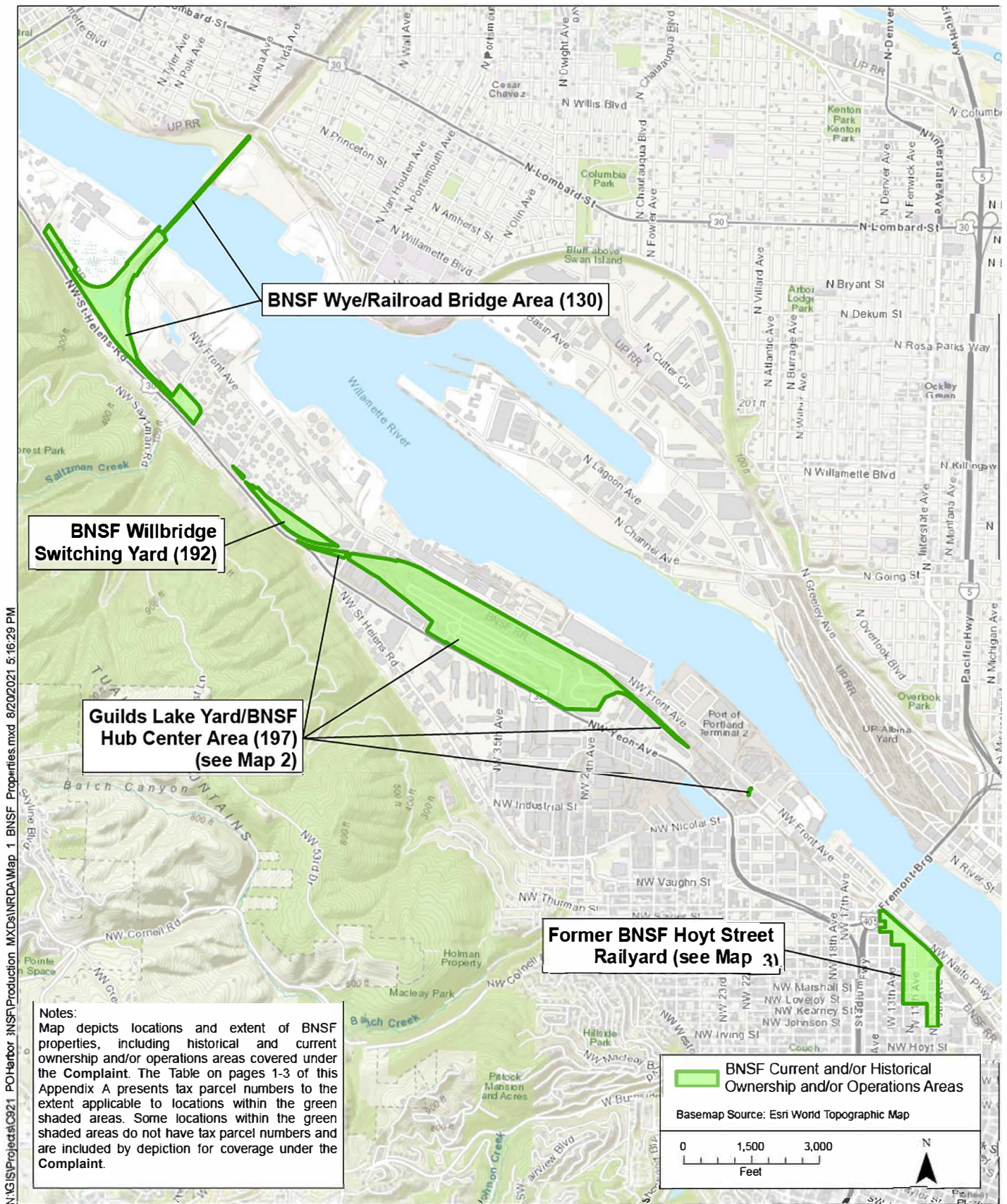
| Trustees' Site ID number | Street Address | Current or Former County Tax Parcel Number |
|---|--|--|
| BNSF Wye/Railroad Bridge Area¹ (Including Map 1, Appendix A, p.4) | | |
| 130 | Wye parcel: 6330-6346 NW St. Helens Rd | Wye parcel: R961130020 |
| BNSF Willbridge Switching Yard (Including Map 1, Appendix A, p. 4) | | |
| 192 | 5814 NW Doane Ave. | R941190510 |
| 192 | 5814 NW Doane Ave. | R941190520 |
| 192 | 5814 NW Doane Ave. | R941190530 |
| | | |

¹ "Wye" is a descriptive term for the area containing segments of BNSF mainlines and part of Doane Lake, and connecting with the west end of BNSF's railroad bridge across the Willamette River. The tax number for most of the Wye is R961130020. While no mailing address or any sort of office exists at the Wye, Portland Maps lists address numbers "6330-6346 NW St. Helens Road" for the Wye area. The mainline segment on the west border of the Wye parcel and the connecting BNSF bridge and its east end embankment, included in Maps 1 and 2, have no tax parcel number or address.

| Trustees' Site ID number | Street Address | Current or Former County Tax Parcel Number |
|--|-------------------------|--|
| Guilds Lake Yard/BNSF Hub Center² Area (Including Maps 1 and 2, Appendix A, pp. 4 and 5) | | |
| 197 | 3500 NW Yeon Ave. | R941190010 |
| 197 | 3500 NW Yeon Ave. | R941190040 |
| 197 | 3500 NW Yeon Ave. | R941190170 |
| 197 | 3500 NW Yeon Ave. | R941190180 |
| 197 | 3500 NW Yeon Ave. | R941190350 |
| 197 | 3500 NW Yeon Ave. | R941190560 |
| 197 | 3500 NW Yeon Ave. | R941190570 |
| 197 | 3500 NW Yeon Ave. | R941190580 |
| 197 | 3500 NW Yeon Ave. | R941190590 |
| 197 | 3500 NW Yeon Ave. | R941190600 |
| 197 | 3500 NW Yeon Ave. | R941190610 |
| 197 | 3500 NW Yeon Ave. | R941190660 |
| 197 | 3500 NW Yeon Ave. | R941190670 |
| 197 | 3500 NW Yeon Ave. | R941190830 |
| 197 | 3500 NW Yeon Ave. | R941200040 |
| 197 | 3500 NW Yeon Ave. | R941201230 |
| 197 | 3500 NW Yeon Ave. | R941201250 |
| 197 | 3500 NW Yeon Ave. | R941280360 |
| 197 | 3500 NW Yeon Ave. | R941290680 |
| 197 | 3500 NW Yeon Ave. | R941290730 |
| 197 | 3500 NW Yeon Ave. | R941292130 |
| Former BNSF Hoyt Street Railyard (Including Maps 1 and 3, Appendix A, pp. 4 and 6) | | |
| 316G | NW 9 th Ave. | R001500010 |
| 316G | NW 9 th Ave. | R180220350 |
| 316G | NW 9 th Ave. | R180220354 |
| 316G | NW 9 th Ave. | R180222160 |
| 316G | NW 9 th Ave. | R180222190 |
| 316G | NW 9 th Ave. | R405841300 |
| 316G | NW 9 th Ave. | R883801710 |
| 316G | NW 9 th Ave. | R405841350 |
| 316G | NW 9 th Ave. | R405841400 |
| 316G | NW 9 th Ave. | R405841450 |
| 316G | NW 9 th Ave. | R405840750 |
| 316G | NW 9 th Ave. | R405841500 |
| | | |

² BNSF's Hub Center has operated and operates on a leased portion of some of or parts of the listed tax parcels within Guilds Lake Yard. The address for the BNSF Hub Center is 3930 NW Yeon Ave.

| Trustees' Site ID number | Street Address | Current or Former County Tax Parcel Number |
|---|---------------------------------------|--|
| Former BNSF Hoyt Street Railyard (Including Maps 1 and 3, Appendix A, pp. 4 and 6) (continued) | | |
| 316G | NW 9 th Ave. | R405841550 |
| 316G | NW 9 th Ave. | R405841600 |
| 316G | NW 9 th Ave. | R405841650 |
| 316H | NW 9 th Ave. | R405841250 |
| 316H | NW 9 th Ave. | R405841700 |
| 316H | NW Overton & NW 11 th Ave. | R405840780 |
| 316I | NW 9 th Ave. | R179750010 |
| 316I | NW 9 th Ave. | R405840900 |
| 316I | NW 9 th Ave. | R405840950 |
| 316I | NW 9 th Ave. | R405841000 |
| 316I | NW 9 th Ave. | R405841050 |
| 318G | NW 9 th Ave. | R252050010 |
| 318G | NW 9 th Ave. | R405840790 |
| 318G | NW 9 th Ave. | R405841200 |
| 333I | NW 9 th Ave. | R405840800 |
| 333I | NW 9 th Ave. | R405840850 |
| 335I | NW 9 th Ave. | R405840350 |
| 335I | NW 9 th Ave. | R405840400 |
| 623H | NW 9 th Ave. | R405840770 |
| 623H | NW 9 th Ave. | R405840764 |
| 623I | NW 9 th Ave. | R405840010 |
| 624I | NW 9 th Ave. | R564380010 |
| 625I | NW 9 th Ave. | R494200010 |
| 626I | NW 9 th Ave. | R659520010 |
| 627I | NW 9 th Ave. | R102280010 |
| 628F | 900 NW Lovejoy St. | R652720880 |
| 628F | 900 NW Lovejoy St. | R652720910 |
| 637 | 920 NW Kearney St. | R652720940 |
| 637 | 920 NW Kearney St. | R652720970 |
| 638 | 1020 NW 12 th Ave. | R801600010 |





BNSF Appendix A, Map 2.
Guilts Lake Yard/BNSF Hub Center Current and Historical
Ownership and/or Operations Areas



BNSF Appendix A, Map 3.
BNSF Former Hoyt Street Railyard Historical Ownership
and/or Operations Areas

Appendix A – Calbag Metals Company

The properties listed below are identified for Calbag Metals Company for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the current Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

| Site ID | County Tax Parcel ID | Street Address | Alternative Account Number |
|----------------|---|--|--|
| 467 | R490749 R490521 R646107 R286791 R286790 R286793 R286792 | 2495 NW Nicolai St (including NW 25 th Ave alley) 2622 NW 25 th Place | R941292191 R941292190 R941292192 R829100150 R829100140 R829100190 R829100170 |
| 653 | R295994 | 2500 NW Nicolai Street | R861700530 |
| 652 | R682748 | 2615 NW Industrial Street a/k/a 2530 NW 25 th Place | R941292220 |
| 512 | R316519 R650129 R650127 | 2710 NW Industrial Street | R941291940 R941291942 R941291941 |
| 563 | R316353 | 2455 NW Nicolai Street | R941280830 |
| 572 | R174666 R174668 R636480 | 3441 NW Guam Street | R347602940 R347602943 R347602946 R941291910 |
| 61 | R325522 R123693 | 12005 N. Burgard Road | R971350710 R118300200 |
| 194 | R315830 | 4927 NW Front Avenue | R941190450 |

Appendix A – City of Portland

The properties and facilities listed below are identified for the City of Portland for purposes of this Complaint. The City's released properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number and not the Site number. The City's released conveyance system facilities are indicated on the attached map and are identified by City of Portland outfall number (OF#) and encompass the City's associated facilities for each outfall inclusive of the collection facilities, treatment facilities and pump stations.

| Site ID Number | County Tax Parcel ID (RNO) | Site ID Number | County Tax Parcel ID (RNO) |
|----------------|--|----------------|--|
| 61 | R118300200 R971350710 | 125 | R961130010 R961130480 |
| 62 | R971350340 R971350460 | 126 | R739100250 R739100380 R739101160 R739101320 |
| 72 | R961020380 | 127 | R739100180 R961120390 R961120410 R961120990 R961121240 R961121420 |
| 112 | R425800090 R425800110 R425800150 R425800170 R425800230 R425806020 R425806050 R425806160 R425806620 R425806900 R425807000 R425807250 R425807450 R425807470 R425807670 | 176 | R649867690 R649867700 No RNO: 1N1E20-A-TR-A |
| 124 | R961130320 R961130040 | 190 | R941201040 |

| Site ID Number | County Tax Parcel ID (RNO) | Site ID Number | County Tax Parcel ID (RNO) |
|----------------|--|----------------|--|
| 193 | R941190770 | 607 | R118300100 |
| 195 | R649831490 R941211160 | 611 | No Tax Id. Bonneville Power Right of Way at River Mile 3.4 |
| 213 | R941280830 R941290860 R941290910 R941291030 R941291570 R941291580 R941291840 | 619 | R941291580 |
| 222 | R649671170 R766004790 | 622 | R009618320 R009618330 |
| 278 | R649729844 R941280350 | 652 | R941292220 |
| 306 | R115200010 R180236820 R180237020 | 213 | R941280990 |
| 414 | R009618170 R009618210 R009618290 R009618370 R009618510 R203800090 R204000100 R244901570 R244901590 R396201240 R553000700 R553000800 R553001000 R553001200 R553001510 R553001610 R553001620 R553001640 R903701740 R009618300 R244902190 | 279 | R009617390 |
| 528 | R941291830 | 279A | R009617400 |

| Site ID Number | County Tax Parcel ID (RNO) | Site ID Number | County Tax Parcel ID (RNO) |
|----------------|--|----------------|--|
| 279B | R009616030 R009616090 | 348B | R850600350 R850600400 R850600450 |
| 279C | R009616770 | 355J | R180200020 |
| 306A | R649812730 R649812740 | 465A | R850600050 |
| 306B | R850600150 R850600250 R850600300 | | |
| 306C | R180217550 R180220230 R180236410 R180236460 R180237200 R180237360 R180237370 R793100300 | | |
| 306D | R793100100 R793100150 R793100250 R793100350 R793100400 | | |
| 306E | R180236250 | | |
| 311C | R180217520 R180236470 R180217530 R180236400 R180236420 R180237210 | | |
| 316D | R793100200 | | |
| 316H/623H | R405840770 | | |
| 334A | R649812750 | | |
| 355K | R180200030 | | |
| 336D | R793100050 | | |

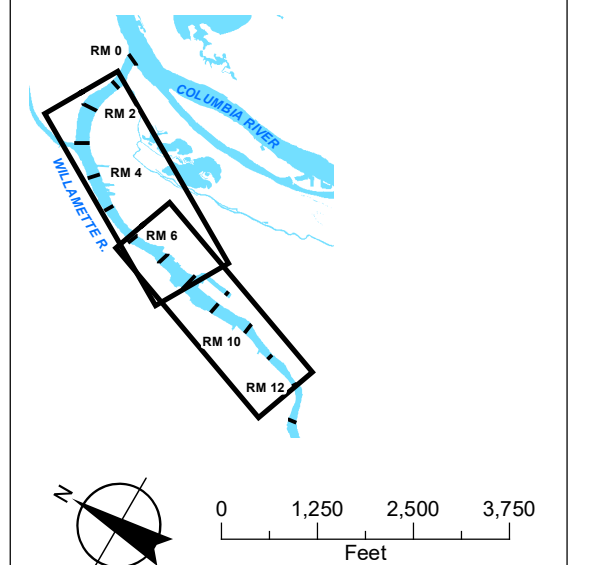


Appendix A

City of Portland Released Conveyance System Map

LEGEND

- City Outfall, Active
- City Outfall, Abandoned



Date: October 5, 2021
Data Sources: BES, Aerial COP 2020



Appendix A – ESCO Group LLC

The properties listed below are identified for ESCO Group LLC for purposes of this Complaint. Properties are identified by the Multnomah County property tax ID and assessor map and lot number. The street address as well as either the Site ID number or, where applicable, the ESCO ID number, are listed for each property in order to provide additional context and reference. However, the property boundaries are based on the current assessor map and lot number, not the street address, the Site ID number or the ESCO ID number.

| Site ID / ESCO ID | Street Address | Property Tax ID | Alternate Account Number | Assessor Map and Lot Number |
|--------------------------|--|---|--|--|
| 138 | 6900 NW Front Ave. | R324216 | R961130440 | 1N1W13A 00500 |
| 203 | 3200 and/or 3208 NW Yeon Ave. | R236763 R236762 R236761 | R649701500 R649701480 R649701460 | 1N1E29AA 01400 1N1E29AA 01500 1N1E29AA 01600 |
| 215 | 2211 NW Brewer St.; 2760 NW Yeon Ave.; 2770 NW Yeon Ave. | R316299 R646139 R316331 R316323 R493040 | R941280050 R941280531 R941280530 R941280410 R941281060 | 1N1E28BC 01500 1N1E28BC 01600A1 1N1E28BC 01600 1N1E28BC 01400 1N1E28BC 01601 |
| 224 | 2245 NW Suffolk St. | R119093 | R094600010 | 1N1E28BC 00700 |
| 304 | 1650 NW Naito Parkway | R699148 | R649911100 | 1N1E28DD 00402 |
| 566 | 2407 NW 28th Ave. | R266228 R266229 | R748500100 R748500150 | 1N1E29DB 00600 1N1E29DB 00700 |
| 572 | 3136 NW 35th Ave. | R174666 R174668 R636480 | R347602940 R347602943 R347602946 | 1N1E29BA 00700 |
| 609 | 2535 NW 28th Ave. | R186833 | R414900490 | 1N1E29DB 00400 |
| 639 | NW Corner 23rd and NW Roosevelt St. | R148111 | R215300420 | 1N1E28CB 03000 |
| ESCO Site A | 2141 NW 25th Ave. | R316317 | R941280370 | 1N1E28C 00100 |
| ESCO Site B | 2141 NW 25th Ave. | R227128 R227136 | R612701390 R612701560 | 1N1E29DD 01600 1N1E29DD 00100 |
| ESCO Site F | 2300 NW 26th Ave.; 2127 NW 26th Ave.; 2635 NW Wilson St. | R316501 R316509 R316491 | R941291680 R941291750 R941291530 | 1N1E29DA 01900 1N1E29DA 01400 1N1E29DA 01300 |
| ESCO Site H | 2404 NW Nicolai St. | R295992 | R861700010 | 1N1E28CB 00700 |
| ESCO Site I | 2414 NW Nicolai St. | R295993 | R861700170 | 1N1E28CB 00800 |

| Site ID / ESCO ID | Street Address | Property Tax ID | Alternate Account Number | Assessor Map and Lot Number |
|-------------------|--|-------------------------------|--|--|
| ESCO Site K | 2539 NW Vaughn St. | R227129 | R612701410 | 1N1E29DD 00200 |
| ESCO Site L | Part of 2300 NW 26th Ave. | R316445 | R941291050 | 1N1E29DA 01800 |
| ESCO Site M | 2300 NW 26th Ave. | R316380 | R941290100 | 1N1E29DA 01700 |
| ESCO Site O | SW Corner 23rd and NW Roosevelt St. | R148103 | R215300280 | 1N1E28CB 03100 |
| ESCO Site P | 2321 NW Roosevelt St. | R148112 | R215300450 | 1N1E28CB 02900 |
| ESCO Site Q | 2133 NW York St. | R269737 R269738 | R766001590 R766001610 | 1N1E28CA 02900 1N1E28CA 03000 |
| ESCO Site R | 2306 NW Reed St. | R148122 | R215300840 | 1N1E28CB 01900 1N1E28CB 02000 1N1E28CB 02100 |
| ESCO Site T | 2380 NW Roosevelt St. | R148109 | R215300380 | 1N1E28CB 03700 |
| ESCO Site U | NE Corner 24th and NW Roosevelt St. | R148113 | R215300460 | 1N1E28CB 02800 |
| ESCO Site X | 2211 NW York St. | R269746 | R766001970 | 1N1E28CA 04600 |
| ESCO Site Y | 2249 NW York St. | R269745 R649663 R269744 | R766001950 R766001890 | 1N1E28CA 04200 1N1E28CA 04300 |
| ESCO Site AA | 2335 NW 23rd Pl. | R148127 | R215300970 | 1N1E28CB 01500 |
| ESCO Site BB | 2345 NW Nicolai St. | R316333 R316351 R316319 | R941280550 R941280810 R941280390 | 1N1E28BC 01900 1N1E28BC 02000 1N1E28BC 02100 |
| ESCO Site CC | 2400 NW 23rd Pl.; 2425 NW 23rd Ave. | R651952 R651953 | R766002231 R766002232 | 1N1E28CB 00100A1 1N1E28CB 00100A2 |
| ESCO Site DD | 2425 NW 23rd Pl. | R269747 | R766002070 | 1N1E28CB 00300 |

Appendix A – EVRAZ Inc. NA

The properties listed below are identified for EVRAZ Inc. NA for purposes of this Complaint. Properties are identified by current legal descriptions from the Multnomah County Department of County Management Assessment and Taxation. The attached Figures, and where available, the Site ID number, street address, and parcel identification number also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current legal description, not the Site number or the street address.

| <u>Site ID number</u> | <u>Street Address</u> | <u>County Parcel ID</u> | <u>Legal Description</u> | <u>Notes</u> |
|-----------------------|-----------------------------------|--|--|--------------|
| 157 | 5555 N. Channel Ave (Building #4) | R543777 (R649840290) R543779 (R649840291); R593920 (R649840292); R646345 (R649840293); R652118 (R649840298) | Partition Plat 2004-8, Lot 1, TL 301 | |
| 158 | 5851 N. Lagoon Avenue | R315645 (R941170730); R315646 (R941170731); R315691 (R941170890) | Section 17 1N 1E, TL 500; Section 17 1N 1E, TL 500 Section 17 1N 1E, TL 700 | |

| <u>Site ID number</u> | <u>Street Address</u> | <u>County Parcel ID</u> | <u>Legal Description</u> | <u>Notes</u> |
|-----------------------|-----------------------------------|---|---|--------------|
| 160 | 5555 N. Channel Ave (Building #9) | R598050 (R649831527); | Section 20 1N 1E, Partition Plot 2003-38, Lot 3, TL 108 | |
| | | R315940 (R941200830; currently part of Site 85); | Section 20 1N 1E, TL 200; | |
| | | R540489 (R649831522) | Partition Plat 2003-38, Lot 3, TL 105 | |
| | | R315718 (R941171190) | Section 17 1N 1E, TL 900 | |
| | | R315965 (R941201110) | Section 20 1N 1E, TL 1000 | |
| | | R315966 (R941201120) | Section 20 1N 1E, TL 900 | |
| | | R315967 (R941201130) | Section 20 1N 1E, TL 800 | |
| | | R315923 (R941200620) | Section 20 1N 1E, TL 200 | |
| | | R315951 (R941200950) | Section 20 1N 1E, TL 1200 | |
| | | R316060 (R941210820) | Section 21 1N 1E, TL 1100 | |
| | | R490451 (R941201300) | Section 20 1N 1E, TL 1300 | |
| | | R316061 (R941210830) | Section 21 1N 1E, TL 500 | |
| | | R236880 (R649704100) | Partition Plat 1990-69, Lot 1, TL 100 | |
| | | R238103 (R649735970) | Partition Plat 1993-150, Lot A | |

| <u>Site ID number</u> | <u>Street Address</u> | <u>County Parcel ID</u> | <u>Legal Description</u> | <u>Notes</u> |
|-----------------------|---|---|---|--|
| 182 | 4950 NW Front Avenue; 5034 NW Front Avenue; 5200 NW Front Avenue; Unknown property address between 4927 NW Front Avenue and 4700 NW Front Avenue on west side of NW Front Avenue | R238223 (R649741630); R238218 (R649741610); R315893 (R941191230); R238220 (R649741620); R315838 (R941190540) | Partition Plat 1994-41, Lot 3 (Section 19A 1N, 1E TL 900); Partition Plat 1994-41, Lot 1 (Section 19A 1N 1E, TL 1000); Section 19 1N 1E, TL 100; Partition Plat 1994-41, Lot 2 (Section 19A 1N 1E, TL 1100); Section 19 1N 1E, TL 1500 | Map provided for reference (Figure 3). Includes all docks, trestles, dolphins, pilings, water intake, equipment, and all other structures affixed thereto or otherwise appurtenant to property over time. Includes all related easements, permits, licenses, rights-of-way, or other possessory interests in other properties over time: an oil pipeline across Port of Portland property; road and railroad spur easements across 5480 NW Front Avenue; and a railroad spur easement across NW Front Avenue and 4700 NW Front Avenue. |
| 142 | 6161 NW 61 st Avenue | R324191 (R961130130) | Section 13 1N 1W, TL 600 | |
| 13 | 14400 N. Rivergate Blvd | R239681 (R649774290) | Section 26, 2N 1W, Partition Plat 1997-108, Lot 1, TL 800 | Map provided for reference (Figure 2). Includes all docks, trestles, dolphins, pilings, water intake, equipment, and structures affixed thereto or otherwise appurtenant to property over time. Includes easements and rights of way: track and rail easements and natural gas pipeline easements and rights of way across adjacent properties. |

| <u>Site ID number</u> | <u>Street Address</u> | <u>County Parcel ID</u> | <u>Legal Description</u> | <u>Notes</u> |
|-----------------------|---|--|---|--------------|
| 60 | 9040 N. Burgard Way | R3225527 (R971350740) | Section 35 2N 1W, TL 300 | |
| 64 | 11920 N. Burgard Rd. 11920 WI / N. Burgard Rd. | R325486 (R971350130); R251997 (R687300050); R325491 (R971350260); R325532 (R971350770); R501677 (R971360410); | Section 35 2N 1W, TL 1200; RAMSEY VILLA AC, LOT F-H&J TL 600; Section 35 2N 1W TL 1500; Section 35 2N 1W TL 1400; Section 36 2N 1W TL 700 | |
| 73 | 11040 N. Lombard Port of Portland Terminal 4 | POP Terminal 4 Berths 414/415 R323783 (R961020930); R537423 (R961021330); R323764 (R96102390); R323769 (R961020420); R323790 (R961021020) R324084 (R961110340); R323778 (R961020630) | Section 02 1N 1W, TL 300; Section 02 1N 1W, TL 800; Section 02 1N 1W, TL 1000; Section 02 1N 1W, TL 200; Section 02 1N 1W, TL 2400; Section 11 1N 1W, TL 100 Section 02 1N 1W, TL 900 | |

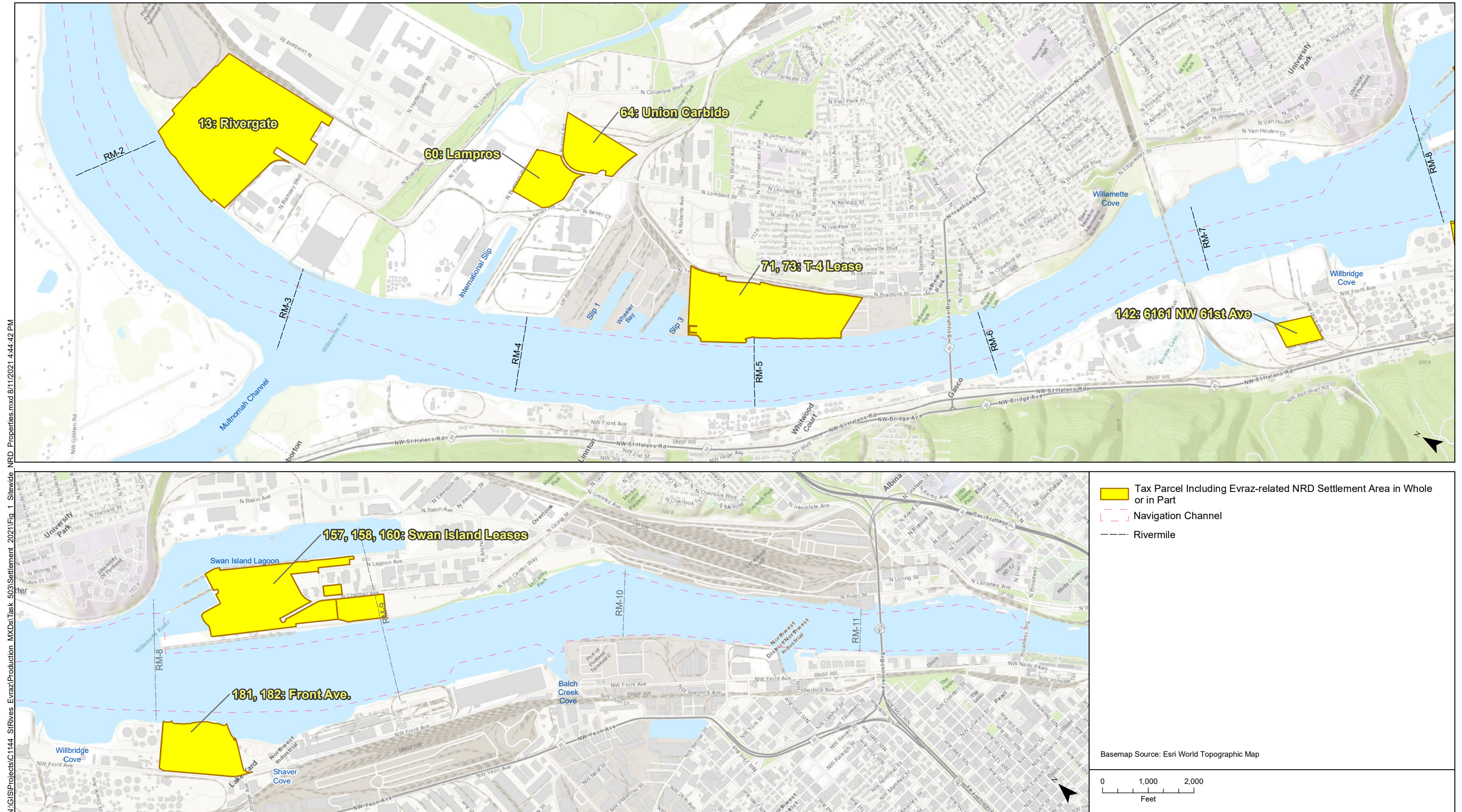


Figure 1.
NRD Settlement Areas for Evraz-Related Properties

N:\GIS\Projects\C1144 StRives Evraz\Production MXDs\Task 503\Settlement 2021\Fig 2 Rivergate Property.mxd 8/1/2021 5:14:27 PM



Figure 2.
Parcels Covered by Evraz NRD Settlement
Rivergate Property

N:\GIS\Projects\C1144_SrRives_Evraz\Production_MXD\Task_503\Settlement_2021\Fig_2_Front_Ave_Property.mxd 8/9/2021 10:07:47 AM



Appendix A – Gould Electronics Inc.

The properties listed below are identified for Gould Electronics Inc. for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

| Site ID number | Street Address | County Tax Parcel ID |
|-----------------------|---------------------------------|-----------------------------|
| Site 140 | 5909 NW 61 st Avenue | R961130350 |

Appendix A – HAJ, Inc.

The properties listed below are identified for HAJ, INC. d/b/a CHRISTENSON OIL COMPANY for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

| Site ID number | Street Address | Multnomah County Tax Parcel ID | State ID |
|-----------------------|---|--|--|
| 503 | 3821 NW St. Helens Road Portland, Oregon 97210 | R253424 (Alt. Acct. #: R697400830) R253423 (Alt. Acct. #: R697400800) R253422 (Alt. Acct. #: R697400770) | 1N1E19DD-01200 1N1E19DD-01300 1N1E19DD-01400 |
| 503 | 3865 NW St. Helens Road Portland, Oregon 97210 | R315874 (Alt. Acct. #: R941190980) | 1N1E19DC-00500 |

Appendix A – Hercules, LLC, Ashland, Inc., and Valvoline, Inc.

The properties listed below are identified for:

- Hercules, LLC, successor in interest to Hercules Incorporated;
- Ashland Inc., successor in interest as of August 1, 2022 to Ashland LLC (which was successor in interest to previous Ashland, Inc.); and
- Valvoline, Inc., the formerly wholly owned subsidiary of Ashland LLC

for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

| Site ID number | Street Address | County Tax Parcel ID | Notes |
|----------------|-------------------------------|--|--|
| 123 | 7540 NW Helens Rd. | R961120420 R961121300 R961121120 R961121290 R961121310 R961121130 R961121230 R961130540 R961130410 | NW Natural Gas Co. Property associated with Hercules, LLC short term storage |
| 239 | 6650 N. Basin Avenue | R941171070 R941170970 R941171220 | Ashland Inc. formerly leased property |
| 271 | 6000 N. Cutter Circle | R605600160 | Ashland Inc. / Valvoline, Inc. formerly leased property |
| 279B | 2308 N. Clark Ave. | R009616030 R009616090 | Ashland Inc. / Valvoline, Inc. formerly owned property |
| 508 | 3366 NW Yeon Ave. | R941201260 R941290010 R941292120 | Hercules, LLC property |
| 509 | 3322 NW 35 th Ave. | R941291370 | Ashland Inc. formerly leased property |
| 510 | 2800 NW 31 st Ave. | R941291160 | Ashland Inc. formerly leased property |

Appendix A – Koppers Inc.

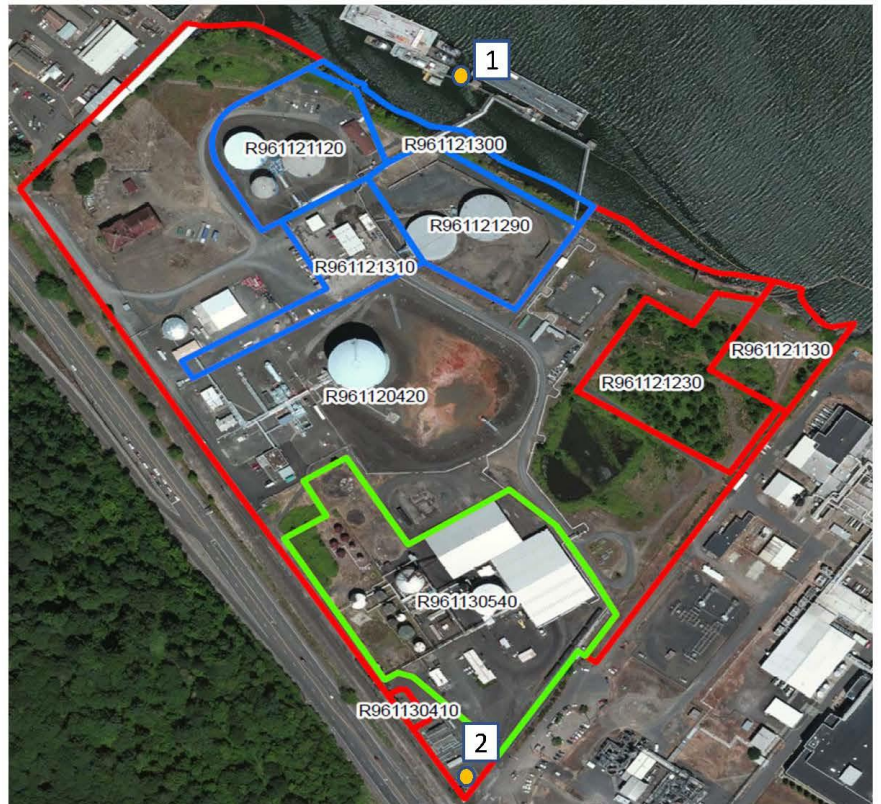
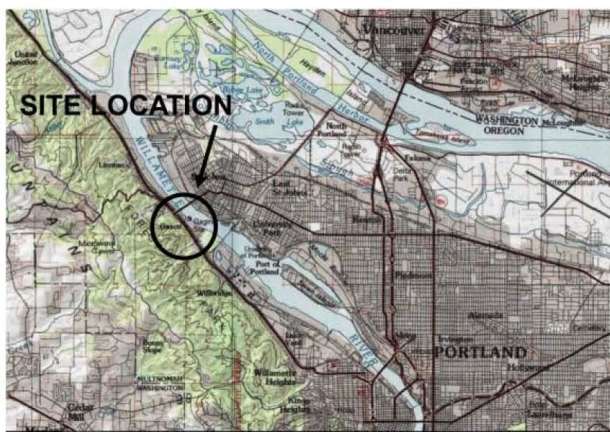
The properties listed below are identified for Koppers Inc. for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

| Site ID number | Street Address | County Tax Parcel ID | Notes |
|----------------|--------------------------------------|--|--------------------|
| 123 | 7540 NW St Helens Road, Portland, OR | R961120420 (R324113) R961121300 (R324171) R961121120 (R324159) R961121290 (R324170) R961121310 (R324172) R961121130 (R324160) R961121230 (R324165) R961130540 (R502592) R961130410 (R324213) | [See attached map] |

Koppers Inc. Released Facilities:

1. Gasco dock – River Mile 6.3
2. NPDES Permit No. 100419, replaced by NPDES Permit No. 101003 and then NPDES Permit No. 101642; Outfall No. 001, River Mile 6.5.

See attached map at ● for 1 and 2.

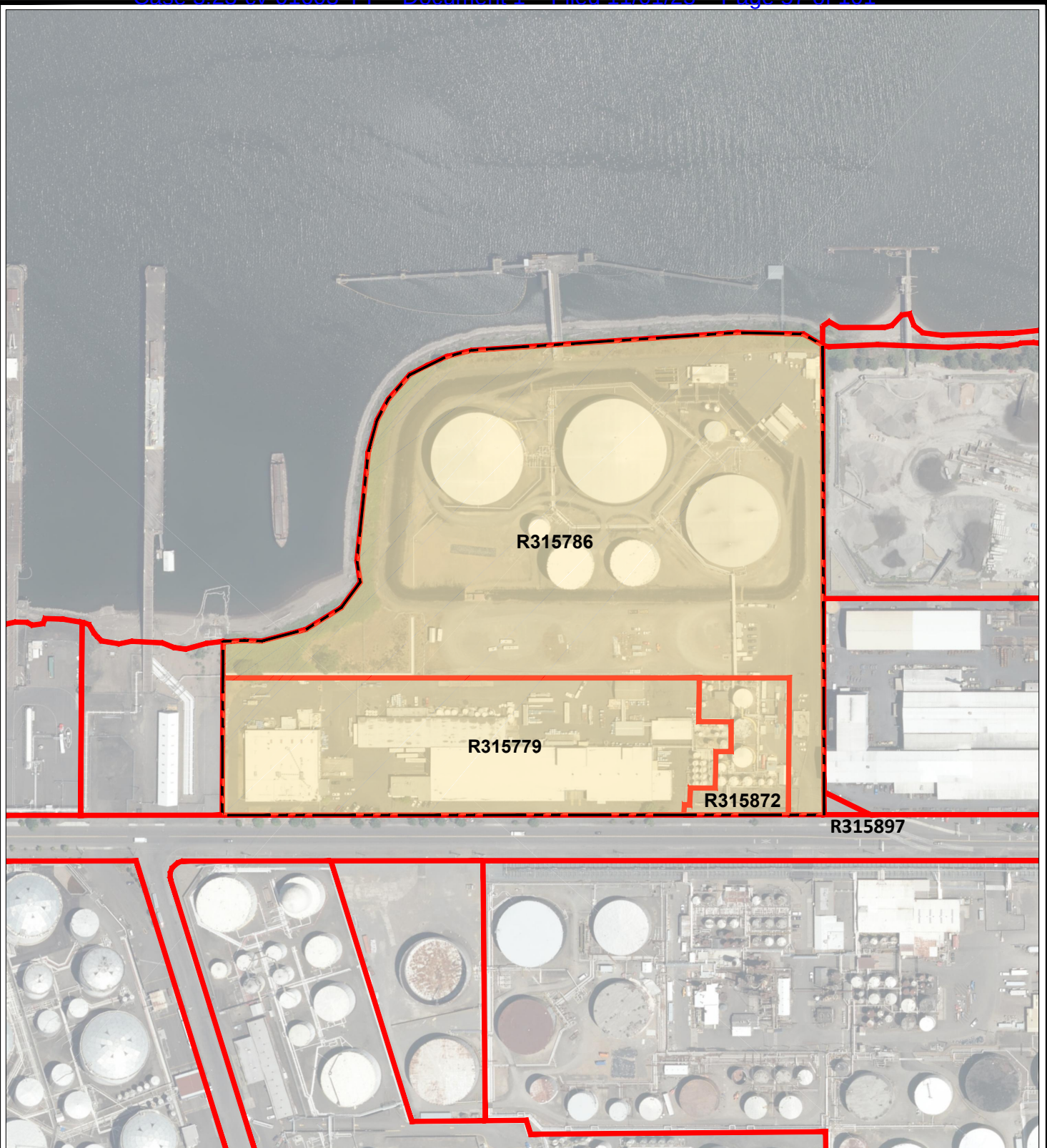


Appendix A – McCall Oil

The properties listed below are identified for McCall Oil and Chemical Corporation, McCall Oil Real Estate Company LLC, Morec Front LLC, GWC Properties, LLC, GWC Front, LLC, and Tanker Basin LLC, for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

| Site ID number | Street Address | Assessor's Parcel Number | Alt Account Number | Notes |
|-----------------------|------------------------|---------------------------------|---------------------------|--------------|
| 136 | 5480 NW FRONT AVE | R315786 | R941180260 | See Figure 1 |
| 136 | 5540-5740 NW FRONT AVE | R315779 | R941180170 | See Figure 1 |
| 136 | 5700 NW FRONT AVE | R315872 | R941190960 | See Figure 1 |
| 136 | 5480 NW FRONT AVE | R315897 | R941191270 | See Figure 1 |

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Source: Tax District and Map Image Viewer <http://multco.maps.arcgis.com>

LEGEND:

- Approximate Parcel Boundary
- Approximate Property Boundary



Figure 1

**PARCEL MAP
McCALL OIL AND
CHEMICAL CORPORATION
PORTLAND, OREGON**



Appendix A – MMGL LLC

The properties listed below are identified for MMGL LLC for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

| Site ID number | Street Address | County Tax Parcel ID |
|----------------|--|--|
| 51 | 10350 N. Time Oil Road | R971350650, R971350620, R971350630, R971350180, R971350310, R971350600, R971350380 |
| 52 | 9125 N. Time Oil Road, 9449 N. Burgard Way, 9945 N. Burgard Way, 10400 N. Burgard Way, 12005 N. Burgard Road | R971350570, R971350550, R971350760, R971350560, R118300300, R118300010, R118300900, R118300700, R118300800, R971350571 |
| 55 | 9333 N. Time Oil Road | R118301000 |
| 56 | 9449 N. Burgard Way | R118300400, R118300500, R118300600 |
| 60 | 9040 N. Burgard Way | R971350740 |
| 61 | 12005 N. Burgard Road | R971350710, R118300200 |
| 109 | 8940/8970 N. Bradford Street | R425807870 |
| 141 | 6529 NW Front Ave. | R961130330 |
| 158 | 5851 N. Lagoon Ave. | R941170730, R941170890 |
| 186 | 4250 NW Front Ave. (former address of relevant portion of Site 186, all of which is now addressed as 4700 NW Front Ave.) | R941200570, R941191240, R941200500, R941191190 |
| 203 | 3200-3340 NW Yeon Ave., 3340-3342 NW 26 th Ave. | R649701500, R941291430, R649701480, R649701460, R934690010, R941280990, R941280950 |
| 204 | 3721 NW Front Ave. | R941200220 |
| 205 | 3641/3683 NW Front Ave. | R941200980 |
| 209 | 3333 NW Front Ave. | R941280470 |
| near 227 | 2262 NW Nicolai Street | Formerly R766002340, now occupied by a portion of U.S. Route 30 |
| 329 | 1415 NW 12 th Ave. | R180221780 |
| 533 | 3033 NW Yeon Ave. | R941290860 |
| 546 | 4319 NW Yeon Ave. | R649704660 |
| 547 | 4110 NW St. Helens Road/4285 NW Yeon Ave. | R941190130 |
| 565 | 4325-4347 NW Yeon Ave. | R649704640 |

| Site ID number | Street Address | County Tax Parcel ID |
|----------------|------------------------------------|------------------------|
| 589 | 3720 NW Yeon Ave. | R941291670 |
| 590 | 3055-3061 NW Yeon Ave. | R941290960 |
| 607 | 12005 N. Burgard Road | R118300100 |
| 608 | 4931-5043 NW Front Ave. | R941190500 |
| 609 | 2531-2535 NW 28 th Ave. | R414900490 |
| 648 | 2000/2019 NW Wilson Street | R766000300 |
| 649 | 2306 NW Reed Street | R215300840 |
| 650 | 2321-2337 NW York Street | R215300810, R215300890 |
| 651 | 3738 NW Yeon Ave. | R941290800 |

Appendix A – Northwest Pipe Company

The properties listed below are identified for NORTHWEST PIPE COMPANY fka NORTHWEST PIPE & CASING COMPANY and NORTHWEST PIPE AND CASING COMPANY (“NW Pipe”) for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

| Street Address | County Tax Parcel ID | Notes |
|---------------------|---|---|
| 12005 N Burgard Rd | Alt. Acct Nos. R971350469; R971350460 | Main Site ID Nos. are 62 and #607 See attached map – Areas B through I |
| 9040 N. Burgard Way | Alt. Account No. R971350740 | See attached map – Area R |
| 12005 N Burgard Rd | Alt. Account No. R971350340 | Main Site ID Nos. are 62 and #607 See attached map – Area A |
| 12005 N Burgard Rd | Assoc. w/ Alt. Acct. No. R118300100 | See attached map – Area K |
| 12005 N Burgard Rd | Assoc. w/ Alt. Acct. No. R118300800 | See attached map – Area L |
| 12005 N Burgard Rd | Assoc. w/ Alt. Acct. No. R118300700 | See attached map – Area M |
| 12005 N Burgard Rd | Assoc. w/ Alt. Acct No. R118300100 | See attached map – Area N |
| 12005 N Burgard Rd | Assoc. w/ Alt. Acct No. R118300200 | See attached map – Area O |
| 12005 N Burgard Rd | Assoc. w/ Alt. Acct No. R118300300 | See attached map – Area P |
| 12005 N Burgard Rd | Assoc. w/ Alt. Acct No. R118300200 | See attached map – Area Q |
| 12005 N Burgard Rd | Assoc. w/ Alt. Acct No. R118300100 | See attached map – Far west portion of Area K |
| 12005 N Burgard Rd | Assoc. w/ Alt. Acct No. R118300100 | See attached map – Area J |
| 12005 N Burgard Rd | Assoc. w/ Alt. Acct No. R971350710 and R118300200 | See attached map – Area S |
| 12005 N Burgard Rd | Assoc. w/ Alt. Acct No. R118300200 | See attached map – Area T |
| 9125 N Time Oil Rd | Assoc. w/ Alt. Acct Nos. R118300700, R118300800 | See attached map –Portion of southern Areas M and L |

Appendix A - PacifiCorp**PacifiCorp Currently Owned/Operated Properties**Properties associated with specific tax parcels

| Property Description | Address | Property ID | State ID | County Tax Alternate Account No. |
|--|--|--------------------|------------------|---|
| Albina Substation (Blocks 71, 81 and 82, Albina) | Between N. Lewis and N. Harding Avenue, and between N. River and N. Railroad Streets | R102677 (Block 71) | 1N1E27CB - 01000 | R009616420 |
| | | R102695 (Block 81) | 1N1E27CB - 01200 | R009617190 |
| | | R102696 (Block 82) | 1N1E27CB - 01100 | R009617290 |
| Knott Substation (Portions of Blocks 26 & 27, Albina) | West of NE Rodney Ave., between NE Russell St. and NE Knott St. (91 NE Russell St.) | R102427 | 1N1E27AD - 16700 | R009610170 |
| | | R102428 | 1N1E27AD - 16600 | R009610180 |
| | | R102429 | 1N1E27AD - 16800 | R009610190 |
| | | R102430 | 1N1E27AD - 16500 | R009610200 |
| | | R102431 | 1N1E27AD - 16400 | R009610210 |
| | | R102432 | 1N1E27AD - 16300 | R009610220 |
| | | R102433 | 1N1E27AD - 16200 | R009610230 |
| | | R102434 | 1N1E27AD - 16100 | R009610240 |
| | | R102435 | 1N1E27AD - 16000 | R009610250 |
| | | R102437 | 1N1E27AD - 15800 | R009610360 |

| Property Description | Address | Property ID | State ID | County Tax Alternate Account No. |
|--|---|---|---|---|
| Knott Substation (Portions of Blocks 26 & 27, Albina) | West of NE Rodney Ave., between NE Russell St. and NE Knott St. (91 NE Russell St.) | R102438 | 1N1E27AD - 15600 | R009610450 |
| | | R102439 | 1N1E27AD - 15700 | R009610460 |
| Lincoln Substation, South Waterfront Extension | 2477 S Moody Ave. | R273075 (property) / R273076 (easement) | 1S1E03CD - 00901 / 1S1E03CD - 00901-A1 | R779900360 / R779900361 |

Other Properties

Transmission and Distribution System, Albina, Lincoln and Downtown Districts

Facilities and service areas identified in attached Exhibits A-1 and A-2, including poles, towers, transmission and distribution lines, submarine cable crossings and transformers.

PacifiCorp Formerly Owned/Operated Properties

| Property Description | Address | Property ID | State ID | County Tax Alternate Account No. |
|---|---------------------------|---------------------------------------|------------------|---|
| Block 69, Albina, Lots 7 & 8 | 2170 – 2182 N. Lewis Ave. | R102675 | 1N1E27CA - 06000 | R009616320 |
| Block 78, Albina | 1303 S/ N River St. | R102691 | 1N1E27CB - 02600 | R009616890 |
| | 1303 W/ N River St. | R102692 | 1N1E27CB - 02500 | R009616900 |
| Block 79, Albina | 2223 N. Randolph Ave. | R102693 | 1N1E27CB - 01400 | R009616990 |
| Block 80, Albina | 2204 N. Randolph Ave. | R102694 | 1N1E27CB - 01300 | R009617100 |
| Block 83, Albina | 2110 N. Lewis Ave. | R102697 | 1N1E27CA - 06400 | R009617390 |
| | | R532607 | 1N1E27CA - 06401 | R009617400 |
| | | N. Tillamook St. Ramp (no Tax Parcel) | | |
| Former Lincoln Station (PacifiCorp ownership areas as depicted in attached Exhibit A-3) | Foot of SW Lincoln Street | R238252 | 1S1E03CD - 00300 | R649742170 |
| | | R238253 | 1S1E03CD - 00200 | R649742180 |
| | | R246187 (Portion) | 1S1E03CA - 01000 | R667709440 |
| | | R273071 | 1S1E03CD - 00500 | R779900200 |

| Property Description | Address | Property ID | State ID | County Tax Alternate Account No. |
|--|---------------------------------|----------------------|------------------------|---|
| Former Lincoln Station (PacifiCorp ownership areas as depicted in attached Exhibit A-3) | Foot of SW Lincoln Street | R273073 | 1S1E03CD - 00800 | R779900300 |
| | | R273074 | 1S1E03CD - 00900 | R779900350 |
| | | R273075 | 1S1E03CD - 00901 | R779900360 |
| | | R273076 | 1S1E03CD - 00901-A1 | R779900361 |
| | | R273077 (Portion) | 1S1E03CD - 01000 | R779900400 |
| | | R326736 (Portion) | 1S1E03CA - 01200 | R991030290 |
| | | R487357 | 1S1E03CD - 00102 | R649795140 |
| | | R592350 | 1S1E03CD - 90000 | R799400010 |

+ River Mile

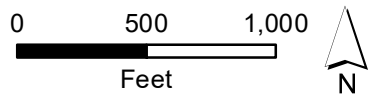
Facility Points

- Pole Mounted Transformer
- ▲ Pad Mounted Transformers
- ☒ Underground Transformers
- Distribution Structure
- ☐ Transmission Structure

— Distribution Primary Lines
Distribution Secondary Lines

 PacifiCorp Owned

Albina - PacifiCorp



TM Zone 10, NAD83, meters.

PacifiCorp makes no representations or warranties as to the accuracy, completeness or fitness for a particular purpose with respect to the information contained in this map. PacifiCorp shall have no responsibility or liability to any person or entity resulting from the use of any information furnished in this map.

Service Layer Credits: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User

PacifiCorp

Exhibit A-2

Lincoln and Downtown District
Transmission and Distribution
System Facilities

+ River Mile

Facility Points

▲ Pad Mounted
Transformers▣ Underground
Transformers

□ Transmission Structure

— Distribution Primary Lines
*Distribution Secondary
Lines*

Transmission Lines

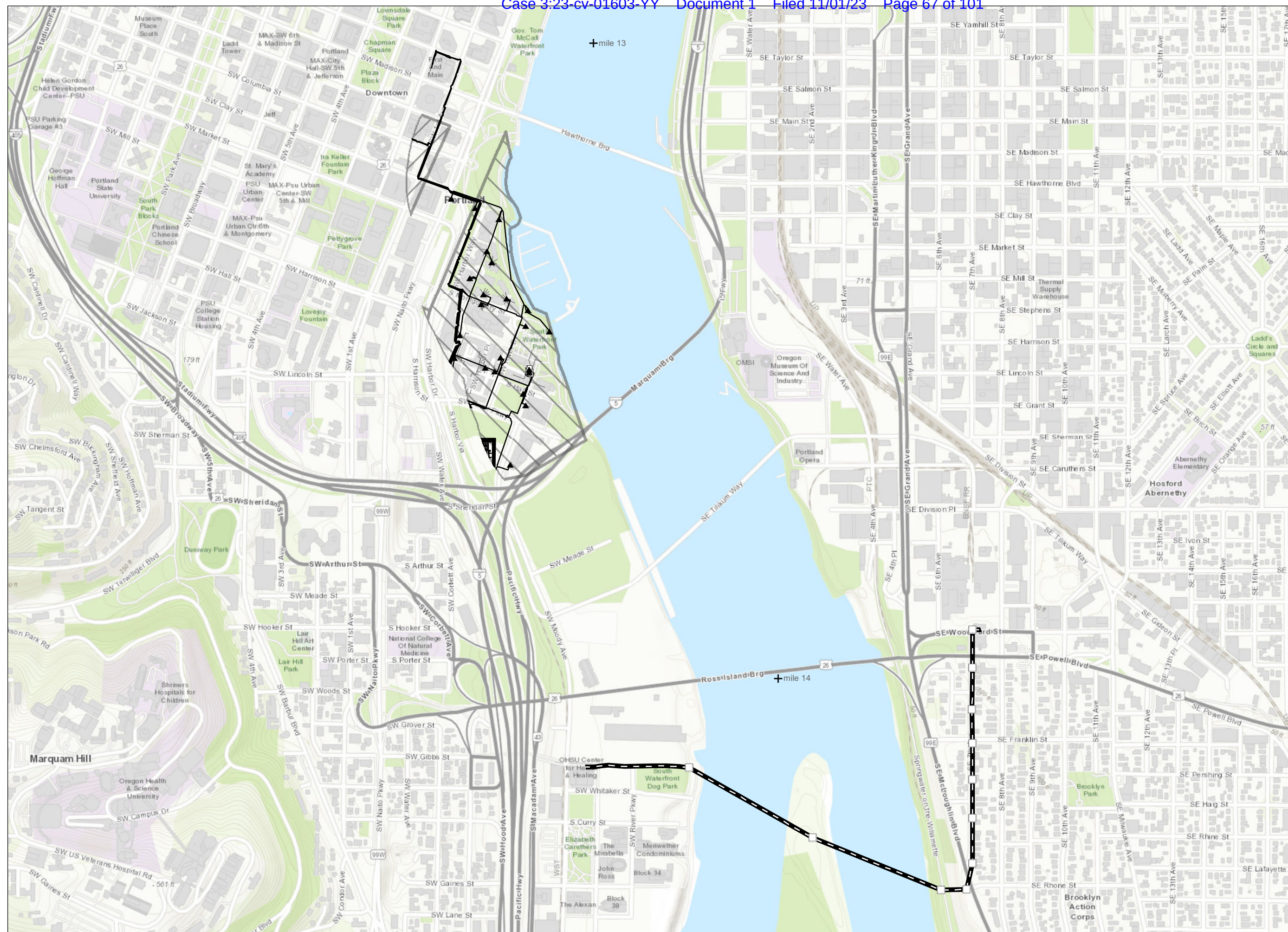
— PacifiCorp Owned

Service Areas

▣ Lincoln - PacifiCorp
(Parcel B)▣ Downtown Core - Shared
(Parcel D)Feet
0 610 1,220 NGIS SUPPORT SERVICES
Solutions Group
gisdept@pacifiCorp.comData is projected in
UTM Zone 10, NAD83, meters.

PacifiCorp makes no representations or warranties as to the accuracy, completeness or fitness for a particular purpose with respect to the information contained in this map. PacifiCorp shall have no responsibility or liability to any person or entity resulting from the use of any information furnished in this map.

Service Layer Credits: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User





Appendix A – Port of Portland

The properties listed below are identified for Port of Portland for purposes of this Complaint, along with: (a) any docks, dry docks, wharves, berths, or other structures (or equipment on them), that extended or extend from any of the listed properties into or over the waters of the Willamette River; and (b) any immediately adjacent areas formerly owned by the Port that became roads, streets, railroads, or rights-of-way (that may or may not have tax parcel numbers). Properties listed below are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where applicable, the "Formerly Known As" column identifies former parcel numbers that have cancelled into the listed current parcel number or provides other clarifying information. Where available, the Site ID number and street address are also listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

| Site ID ¹ | Mult Co Alt Act# | Address ² | Formerly Known As ³ |
|----------------------|------------------|--------------------------------|------------------------------------|
| 8 | R708881588 | 15660 N LOMBARD ST | |
| 8 | R708881940 | 15660 N LOMBARD ST | R708882420; R708882440, R708882430 |
| 8 | R708881600 | 15660 N LOMBARD ST | |
| 8 | R708882410 | 15660 N LOMBARD ST | |
| 8 | R708881908 | 15660 N LOMBARD ST | |
| 8 | R708881890 | 15660 N LOMBARD ST | |
| 8 | R708881960 | 15660 N LOMBARD ST | R708881880; R708881950; R708881930 |
| 8 | R708882620 | 15660 N LOMBARD ST | |
| 8 | R708882850 | 15660 N LOMBARD ST | |
| 8 | R708881910 | 15660 N LOMBARD ST | |
| 8 | R708880036 | 15660 N LOMBARD ST | |
| 8 | R708881584 | 15660 N LOMBARD ST | R708881582 |
| 8 | R708892700 | 15660 N LOMBARD ST | R708880020 |
| 8 | R708881870 | 15660 N LOMBARD ST | |
| 8 | R708881900 | 15660 N LOMBARD ST | |
| 8 | R708881590 | 15660 N LOMBARD ST | |
| 8 | R708882200 | 15660 N LOMBARD ST | |
| 13 | R649774290 | 14400 N RIVERGATE BLVD | |
| 17 | R971260240 | 14003 N RIVERGATE BLVD | |
| 17 | R971260310 | 14003 N RIVERGATE BLVD | |
| 18 | R971260260 | 14025 N RIVERGATE BLVD | |
| 21 | R971260190 | 13939 N RIVERGATE BLVD | |
| 22 | R708882760 | SWC/ RAMSEY & N RIVERGATE BLVD | |
| 22 | R708883810 | 9639 N RIVERGATE BLVD | |
| 22 | R708887010 | 13333 WI/ N RIVERGATE BLVD | |

| Site ID ¹ | Mult Co Alt Act# | Address ² | Formerly Known As ³ |
|----------------------|------------------|----------------------------------|--|
| 22 | R708882700 | 9699 S/ N RIVERGATE BLVD | |
| 22 | R708882770 | LEVY CODE 201 | |
| 22 | R708883800 | 9619 N RIVERGATE BLVD | |
| 22 | R708882666 | LEVY CODE 201 | |
| 22 | R708887100 | 13035 N RIVERGATE BLVD | |
| 22 | R708886700 | LEVY CODE 201 | |
| 22 | R708887220 | N TIME OIL RD | |
| 22 | R708886500 | LEVY CODE 201 | |
| 22 | R708886510 | LEVY CODE 201 | |
| 22 | R708882680 | LEVY CODE 201 | |
| 22 | R708886600 | 13333 N RIVERGATE BLVD | |
| 22 | R971260030 | 13333 N RIVERGATE BLVD | |
| 22 | R708882800 | 13333 N RIVERGATE BLVD | |
| 22 | R708880040 | 13333 N RIVERGATE BLVD | |
| 22 | R359500020 | 13333 N RIVERGATE BLVD | |
| 22 | R708887000 | 13333 N RIVERGATE BLVD | |
| 22 | R708883840 | 13333 N RIVERGATE BLVD | |
| 22 | R708883830 | 9639 N RIVERGATE BLVD | |
| 22 | R708890250 | 9333 N RIVERGATE BLVD | |
| 22 | R708884120 | LEVY CODE 201 | |
| 22 | R971260340 | LEVY CODE 201 | |
| 22 | R708882740 | W END/ N RAMSEY BLVD | |
| 22 | R359500100 | 9345 N HARBORGATE ST | |
| 24 | R971260200 | 13940 N RIVERGATE BLVD | |
| 24 | R708884300 | 9715 N RAMSEY BLVD | R971260210 |
| 47 | R971350100 | LEVY CODE 201 | |
| 48 | R708887200 | 13035 N RIVERGATE BLVD | |
| 71 | R971350540 | 11040 N LOMBARD ST/TERMINAL 4 | |
| 71 | R971350250 | 11041 N LOMBARD ST/TERMINAL 4 | |
| 71 | R971350240 | 11040 N LOMBARD ST/LEVY CODE 201 | |
| 71 | R961021100 | 11040 N LOMBARD ST | R961021280, R961021350, R961021200, R961021360 |
| 71 | R961020410 | 11041 N LOMBARD ST/TERMINAL 4 | |
| 71 | R961021030 | 11042 N LOMBARD ST/TERMINAL 4 | |
| 71 | R961020960 | 11044 N LOMBARD ST/TERMINAL 4 | |

| Site ID ¹ | Mult Co Alt Act# | Address ² | Formerly Known As ³ |
|----------------------|------------------|--|--------------------------------|
| 71 | R961020910 | 11045 N LOMBARD ST/TERMINAL 4 | |
| 71 | R961021260 | 11040 N LOMBARD ST | R961021270 |
| 71 | R961021370 | 11040 N LOMBARD ST | |
| 71 | R961021230 | 11040 N LOMBARD ST | |
| 71 | R961021240 | 11040 N LOMBARD ST | |
| 71 | R961020420 | 11040 N LOMBARD ST/TERMINAL 4 | |
| 71 | R961021250 | 11040 WI/ N LOMBARD ST | |
| 73 | R961020390 | 11020 N LOMBARD ST | |
| 73 | R961021330 | 11020 N LOMBARD ST | R961021340 |
| 73 | R961020930 | N BRADFORD ST | |
| 73 | R961021020 | TERMINAL 4 | |
| 73 | R961021190 | LEVY CODE 201 | |
| 73 | R961020630 | N BRADFORD ST | |
| 73 | R961110340 | N BRADFORD ST | |
| 73 | R961110450 | 11020 N LOMBARD ST | |
| 73 | R961021130 | 10400 N LOMBARD ST | |
| 108 | R961110010 | 8940 N BRADFORD ST | |
| 108 | R961110360 | 8940 N BRADFORD ST | |
| 127 | R961120390 | S/ N PIERCE AVE (FORMER POP PROPERTY) | |
| 127 | R961120410 | SEC/ RICHMOND & N BRADFORD ST (METRO) | |
| 127 | R961120990 | N VAN BUREN AVE (METRO) | |
| 127 | R961121240 | N VAN BUREN AVE (METRO) | |
| 127 | R961121420 | S/ N WILLAMETTE BLVD | |
| 127 | R739100180 | SWC/ BRADFORD & N RICHMOND AVE (METRO) | |
| 133 | R941180200 | 6080 WI/ NW FRONT AVE | R941180060 |
| 136 | R941190960 | 5700 NW FRONT AVE | |
| 136 | R941180170 | 5724-5740 NW FRONT AVE | |
| 136 | R941191270 | 5480 WI/ NW FRONT AVE | |
| 136 | R941180260 | 5480 WI/ NW FRONT AVE | |
| 143 | R941180050 | 5533 WI/ NW DOANE AVE | |
| 144 | R941180040 | 5528 NW DOANE AVE | |
| 157 | R941180390 | 5555 N CHANNEL AVE | |
| 157 | R649840290 | 5555 N CHANNEL AVE | R649831524 |
| 157 | R941201320 | 5555 N CHANNEL AVE | |

| Site ID ¹ | Mult Co Alt Act# | Address ² | Formerly Known As ³ |
|----------------------|------------------|---|--|
| 160 | R649831522 | 5225 N CHANNEL AVE | R649831526 |
| 160 | R649831527 | 5225 N CHANNEL AVE | |
| 160 | R941201120 | N CHANNEL AVE | |
| 160 | R649831508 | N CHANNEL AVE | |
| 160 | R941201130 | N CHANNEL AVE | |
| 160 | R941200620 | 4855 N LAGOON AVE | |
| 160 | R941210030 | SE COR/ BASIN & N WYGANT ST | |
| 160 | R814680150 | N CHANNEL AVE | R649831500 (See Footnote 13) |
| 160 | R941200950 | 4660 N CHANNEL AVE / 4085 N ANCHOR ST | R941201060, R941201050 |
| 160 | R941210820 | 4703-4715 N LAGOON AVE | R941200900, R941211050 |
| 160 | R941201300 | 4703-4715 W/ N LAGOON AVE | |
| 160 | R814680200 | N CHANNEL AVE | R649831494, R814680400, R814680450 |
| 160 | R941210830 | NW COR/ BASIN & N GOING ST | |
| 160 | R649735970 | N CHANNEL AVE / 4344 N/ N PORT CENTER WAY | |
| 160 | R649704100 | 3110 N GOING ST | |
| 160 | R814680404 | 4435-4747 N CHANNEL AVE | R649831511; R814680300; R814680354, R649831506, R649831514, R649831504, R649831502 |
| 160 | R814680204 | 4555 N CHANNEL AVE | R649831513; R814680354 |
| 160 | R814680050 | 4435-4747 N CHANNEL AVE | R649831516, R649831510, R649831512 |
| 160 | R941171190 | S SIDE/ N DOLPHIN ST | R941201240, R941201270 |
| 160 | R941201110 | N CHANNEL AVE | |
| 163 | R941200890 | 5405 N LAGOON AVE | |
| 164 | R025800060 | 7007 S/ N CUTTER CIR | |
| 164 | R025800080 | 7008 S/ N CUTTER CIR | |
| 164 | R941170880 | 6936 N FATHOM ST | |
| 164 | R941171360 | 6936 WI/ N FATHOM ST | |
| 165 | R649840324 | 5420 N LAGOON AVE | |
| 165 | R649840300 | 5420 N LAGOON AVE | |
| 171 | R649755370 | 5036 N LAGOON AVE | |
| 175 | R941200680 | 4859 N LAGOON AVE | |
| 175 | R941200720 | 5001 N LAGOON AVE | |
| 181 | R941191230 | 5034 WI/ NW FRONT AVE | |
| 182 | R649741610 | 5034 NW FRONT AVE | |
| 182 | R649741630 | 4950 NW FRONT AVE | |

| Site ID ¹ | Mult Co Alt Act# | Address ² | Formerly Known As ³ |
|----------------------|------------------|---|--------------------------------|
| 186 | R941200570 | 4700 WI/ NW FRONT AVE | |
| 188 | R941200650 | 3838 NW FRONT AVE | |
| 191 | R941180140 | 5501 NW FRONT AVE | |
| 191 | R941190640 | 5501 NW FRONT AVE | |
| 195 | R649831490 | 4099 N PORT CENTER WAY | |
| 197 | R941190600 | LEVY CODE 001 | |
| 207 | R941291980 | 3445-3455 NW FRONT AVE | |
| 218 | R941201280 | 3556 NW FRONT AVE | |
| 218 | R941280500 | 3556 WI/ NW FRONT AVE | |
| 218 | R941280820 | 3556 WI/ NW FRONT AVE / 2800 N/ NW FRONT AVE | |
| 218 | R941280710 | 3556 WI/ NW FRONT AVE | |
| 218 | R941292160 | NW FRONT AVE | |
| 218 | R941280650 | 3556 WI/ NW FRONT AVE | |
| 218 | R941280630 | 3060-3556 NW FRONT AVE | |
| 218 | R941280440 | 3556 WI/ NW FRONT AVE | |
| 218 | R941280590 | NW SHERLOCK AVE | |
| 222 | R766004790 | 2400 NW FRONT AVE | |
| 231 | R941170920 | 6767 N BASIN AVE | |
| 231 | R941170940 | 6735 N BASIN AVE | |
| 232 | R941171010 | 6211 N ENSIGN ST | |
| 234 | R941171120 | 6208 S/ N ENSIGN ST | |
| 234 | R941171030 | 6208 N ENSIGN ST | |
| 236 | R941170520 | 6147 N BASIN AVE | |
| 236 | R941171290 | 6135 N BASIN AVE | |
| 237 | R941170590 | 5949 N BASIN AVE | See Footnote 4 |
| 238 | R941171260 | 5617-5885 N BASIN AVE | |
| 248 | R941170560 | 5926-5938 N BASIN AVE | R941170550 |
| 249 | R941170540 | 5820 N BASIN AVE | |
| 250 | R941160200 | 5500 N BASIN AVE | |
| 263 | R605604000 | 6845 N CUTTER CIR | |
| 303 | R708820010 | 1700 NW RIVERSCAPE ST | |
| 303 | R637100010 | 1830 NW RIVERSCAPE DR | |
| 303 | R768100010 | NW RIVERSCAPE ST | |
| 303 | R708970150 | NW FRONT AVE / 1850 NW FRONT AVE | |
| 303 | R708970010 | NW FRONT AVE | |
| 303 | R708970270 | NW 16TH AVE | See Footnote 5 |
| 303 | R708970040 | NW 16TH AVE | |

| Site ID ¹ | Mult Co Alt Act# | Address ² | Formerly Known As ³ |
|----------------------|------------------|--|--------------------------------|
| 303 | R708970050 | NW 16TH AVE | |
| 303 | R708970110 | E/ NW FRONT AVE | |
| 303 | R708970100 | E/ NW FRONT AVE | |
| 303 | R708970060 | NW RIVERSCAPE ST | |
| 303 | R708970080 | NW RIVERSCAPE ST | |
| 303 | R708970500 | NWC/ 18TH & NW FRONT AVE / 2220 NW FRONT AVE | |
| 303 | R708970550 | NW FRONT AVE / 2130 NW FRONT AVE | |
| 303 | R708970600 | NW FRONT AVE / 2080 NW FRONT AVE | |
| 303 | R708970650 | NW FRONT AVE / 2010 NW FRONT AVE | R708970700 |
| 303 | R766004290 | PART/ TERMINAL 1 SOUTH | |
| 303 | R708970020 | 1648 NW RIVERSCAPE ST / NW 16TH AVE | |
| 303 | R708970350 | 1648 NW RIVERSCAPE ST | See Footnote 6 |
| 303 | R708970400 | 1648 NW RIVERSCAPE ST | See Footnote 7 |
| 303 | R708970070 | 1648 NW RIVERSCAPE ST | |
| 303 | R708970250 | 1648 NW RIVERSCAPE ST | See Footnote 8 |
| 303 | R708970450 | 1648 NW RIVERSCAPE ST | See Footnote 9 |
| 303 | R708970090 | 1648 NW RIVERSCAPE ST | See Footnote 10 |
| 303 | R708970300 | 1648 NW RIVERSCAPE ST | See Footnote 11 |
| 309 | R180235990 | 1030 NW NAITO PKWY | |
| 596 | R941160220 | 5400 N/ N EMERSON ST | |
| 596 | R941160230 | 5400 N/ N EMERSON ST | |
| 596 | R941210560 | 5400 N BASIN AVE | |
| 596 | R941160210 | 5400 N/ N BASIN AVE | |
| 596 | R941211100 | 5400 WI/ N BASIN AVE | |
| 596 | R941200840 | 5400 WI/ N BASIN AVE | |
| 597 | R941201180 | 5161 WI/ N LAGOON AVE | |
| 597 | R941200910 | 5161 WI/ N LAGOON AVE | |
| 597 | R941200760 | 5161 N LAGOON AVE | |
| 597 | R941200920 | 5160 N LAGOON AVE | |
| 76L | R941210510 | LEVY CODE 710 | |
| 76L | R649729810 | N PORT CENTER WAY | |
| 277L | R941280920 | LEVY CODE 201 | |
| None | R941200060 | 3710 NW FRONT AVE | P120035701 |
| None | R605600020 | S SIDE/ N WILLAMETTE BLVD | R025800021 |

| Site ID ¹ | Mult Co Alt Act# | Address ² | Formerly Known As ³ |
|----------------------|------------------|----------------------------|--|
| None | R649680490 | N CUTTER CIR | R025800020, R025800040 (See Footnote 12) |
| None | R359500050 | 9310 N HARBORGATE ST | |
| None | R359500150 | 9333 N HARBORGATE ST | |
| None | R359500200 | 9442 N RAMSEY BLVD | |
| None | R605600080 | 5910 N CUTTER CIR | |
| None | R605600160 | 6000-6020 N CUTTER CIR | |
| None | R605600340 | 6032-6220 N CUTTER CIR | |
| None | R605600390 | 6330 N CUTTER CIR | |
| None | R605600400 | 6712 N CUTTER CIR | |
| None | R605601980 | 6121 N CUTTER CIR | |
| None | R605602000 | 6421 N CUTTER CIR | |
| None | R605602020 | 6235 N CUTTER CIR | |
| None | R605602021 | 6235 WI/ N CUTTER CIR | |
| None | R605602060 | 3620 N LEVERMAN ST | |
| None | R605602200 | 6400 N CUTTER CIR | |
| None | R605603500 | 6800-6840 N CUTTER CIR | |
| None | R605604700 | 6447 N CUTTER CIR | |
| None | R637101610 | BLANK | |
| None | R649732010 | 5909 N CUTTER CIR | |
| None | R649732020 | 5937 N CUTTER CIR | |
| None | R649735960 | 4344 N PORT CENTER WAY | |
| None | R649744600 | 2435 NW FRONT AVE | |
| None | R649744630 | 2303 NW FRONT AVE | |
| None | R649746970 | 3449-3627 N ANCHOR ST | |
| None | R649746980 | 3449-3627 WI/ N ANCHOR ST | |
| None | R649774295 | 14400 WI/ N RIVERGATE BLVD | |
| None | R649774300 | 14141 N RIVERGATE BLVD | |
| None | R649845770 | 5018 N CHANNEL AVE BLDG #1 | |
| None | R649845780 | 5016 N CHANNEL AVE | |
| None | R649867690 | 3737 N EMERSON ST | |
| None | R649867700 | N BASIN AVE | |
| None | R708881120 | 9200 WI/ N RAMSEY BLVD | |
| None | R708881140 | 9200 N RAMSEY BLVD | |
| None | R708881594 | 15840 WI/ N SIMMONS RD | |
| None | R708881596 | LEVY CODE 393 | |

| Site ID ¹ | Mult Co Alt Act# | Address ² | Formerly Known As ³ |
|----------------------|------------------|--------------------------|--------------------------------|
| None | R708882240 | 15831 N SIMMONS RD | |
| None | R708882260 | 15840 WI/ N SIMMONS RD | |
| None | R708882300 | 16120 N SIMMONS RD | |
| None | R708882870 | 15840 N SIMMONS RD | |
| None | R708883700 | 9211 N HARBORGATE ST | |
| None | R708883900 | 10001 N RIVERGATE BLVD | |
| None | R708884100 | 9625 N RAMSEY BLVD | |
| None | R708890050 | 9222 N HARBORGATE ST | |
| None | R708890150 | 9243 N RIVERGATE BLVD | |
| None | R708890170 | 13225 N LOMBARD ST | |
| None | R708892300 | 14819 WI/ N LOMBARD ST | |
| None | R708892400 | 14819 N LOMBARD ST | |
| None | R708892600 | 15011 N LOMBARD ST | |
| None | R766003220 | NWC/ 21ST & NW FRONT AVE | |
| None | R882434320 | BLANK | |
| None | R941170570 | 5550 N BASIN AVE | |
| None | R941170580 | 6100 N BASIN AVE | |
| None | R941170610 | 6220 N BASIN AVE | |
| None | R941170620 | 5555 N LAGOON AVE | |
| None | R941170680 | 6290 N BASIN AVE | |
| None | R941170730 | 5851 WI/ N LAGOON AVE | |
| None | R941170740 | 6310 N BASIN AVE | |
| None | R941170830 | 5565 N DOLPHIN ST | |
| None | R941170860 | 6457 N BASIN AVE | |
| None | R941170870 | 6650 N ENSIGN ST | |
| None | R941170890 | 5851 WI/ N LAGOON AVE | |
| None | R941170900 | 6520 N BASIN AVE | |
| None | R941170910 | 6707 N BASIN AVE | |
| None | R941170930 | 6645 N ENSIGN ST | |
| None | R941170970 | 6650-6720 N BASIN AVE | |
| None | R941171000 | NWC/ BASIN & N FATHOM ST | |
| None | R941171070 | 6870-6874 N FATHOM ST | |
| None | R941171080 | 5550 WI/ N BASIN AVE | |
| None | R941171130 | 6330-6340 N BASIN AVE | |
| None | R941171150 | S/ N WILLAMETTE BLVD | |
| None | R941171200 | 6335 N BASIN AVE | |
| None | R941171210 | 6707 WI/ N BASIN AVE | |

| Site ID ¹ | Mult Co Alt Act# | Address ² | Formerly Known As ³ |
|----------------------|------------------|----------------------------|--------------------------------|
| None | R941171220 | 6840 N FATHOM ST | |
| None | R941171230 | 6125-6235 N BASIN AVE | |
| None | R941190290 | 4322-4338 NW YEON AVE | |
| None | R941200220 | 3721 NW FRONT AVE | |
| None | R941200700 | 3838 N BALLAST ST | |
| None | R941200730 | 4750 N CHANNEL AVE | |
| None | R941200740 | 4865 N LAGOON AVE | |
| None | R941200750 | 3919 N BALLAST ST | |
| None | R941200780 | 5020 N CHANNEL AVE | |
| None | R941200790 | 5061 N LAGOON AVE | |
| None | R941200800 | 5411 N LAGOON AVE | |
| None | R941200820 | 5051 N LAGOON AVE | |
| None | R941200830 | 5300-5350 N CHANNEL AVE | R941200860 |
| None | R941200850 | 4800 N CHANNEL AVE | |
| None | R941200960 | 4325 N COMMERCE ST | |
| None | R941200970 | 5140 N CHANNEL AVE | |
| None | R941200980 | 3641-3683 NW FRONT AVE | |
| None | R941210850 | 4810 N BASIN AVE | |
| None | R941210870 | 3002-3014 N WYGANT ST | |
| None | R941210980 | 4810 WI/ N BASIN AVE | |
| None | R941211000 | 4730 N LAGOON AVE | |
| None | R941211010 | 4711 N BASIN AVE | |
| None | R941211020 | 4711 WI/ N BASIN AVE | |
| None | R941211110 | 4805-4825 N BASIN AVE | |
| None | R941280320 | 2901 NW FRONT AVE | |
| None | R941280930 | 3045-3065 WI/ NW FRONT AVE | |
| None | R941290570 | 3501-3599 NW YEON AVE | |
| None | R941290830 | 3551 NW FRONT AVE | |
| None | R941291070 | 3150 NW 31ST AVE | |
| None | R941291990 | NW 26TH DRIVE | See Footnote 14 |
| None | R961021140 | 10400 N LOMBARD ST | |
| None | R961021210 | 6921-7011 N ROBERTS AVE | |
| None | R971230030 | LEVY CODE 393 | |
| None | R971230050 | LEVY CODE 393 | |
| None | R941190450 | 4927 NW FRONT AVE | R941200930 |
| None | R605600030 | W SIDE/ N WILLAMETTE BLVD | |

| Site ID ¹ | Mult Co Alt Act# | Address ² | Formerly Known As ³ |
|----------------------|---|----------------------------|--------------------------------|
| None | R605600040 | S SIDE/ N WILLAMETTE BLVD | |
| None | R605600070 | 6800 S/ N CUTTER CIR | |
| None | R605600100 | N CUTTER CIR | |
| None | R605600120 | N BASIN AVE | |
| None | R605600200 | N CUTTER CIR | |
| None | R605600380 | W SIDE/ N WILLAMETTE BLVD | |
| None | R605602210 | W SIDE/ N LEVERMAN ST | |
| None | R941171100 | NEC/ EMERSON & N BASIN AVE | |
| None | R941171110 | 6290 NE/ N BASIN AVE | |
| None | R941171140 | 6645 E/ N ENSIGN ST | |
| None | R941210430 | 5239 N/ N EMERSON DR | |
| | | | |
| FOOTNOTES | | | |
| 1 | Site ID: Site ID number from Trustees' Portland Harbor Allocation Site List. | | |
| 2 | Address: From Port GIS database and/or Multnomah Co tax lot database. | | |
| 3 | "Formerly Known As" column identifies former parcel numbers that have cancelled into the listed current parcel number | | |
| 4 | R941170590; This lot merged into "Partition Plat 2016-10" in 2016 | | |
| 5 | R708970270; This lot merged into "Shoreline Condominiums" in 2006 | | |
| 6 | R708970350; This lot merged into "Shoreline Condominiums" in 2008 | | |
| 7 | R708970400; This lot merged into "Riverfront Place Condominium" in 2011 | | |
| 8 | R708970250; This lot merged into "Shoreline Condominiums Stage 2" in 2006 | | |
| 9 | R708970450; This lot merged into "Pacifica at Riverscape Condominiums" in 2008 | | |
| 10 | R708970090; This lot merged into "Pacifica at Riverscape Condominiums in 2008 | | |
| 11 | R708970300; This lot merged into "Shoreline Condominiums Stage 3" in 2007 | | |
| 12 | R025800020; This lot merged into "Partition Plat 2017-13" in 2017 | | |
| 13 | R649831500; This lot merged into "Swan Island Port Center Campus" in 2019 | | |
| 14 | R941291990; This lot merged into the north end of NW 26th Drive (street) | | |

Appendix A: Property of Portland General Electric Company (PGE) and identified spills or releases

This Appendix A, including Exhibits A-1, A-2 and A-3, contains the descriptions of real and personal property and identified spills and releases and is intended to comprehensively describe all such property and spills or releases included within Appendix A. PGE's distribution network is found throughout the PGE Distribution Network Area Boundary as delineated by the line on the maps provided in Exhibits A-1 and A-2. The distribution network includes but is not limited to poles, towers, transmission and distribution lines, substations, submerged or underground cables and lines, transformers, capacitors, switches, reclosers and vaults, that together distribute or have distributed power to PGE customers. PGE constructed, installed, or acquired the various portions of the distribution network at various times including portions acquired, constructed, and installed by PGE predecessor companies prior to 1930 and by PGE after 1930; and portions acquired from Pacific Power & Light in a territory swap.

Part 1: PGE Current and Historically-Owned or Operated Properties

The following properties and facilities are currently or previously owned or operated by PGE and are included within Appendix A. The properties specified include all facilities, equipment and service areas located within the properties, including but not limited to, any poles, towers, transmission and distribution lines, substations, submerged or underground cables and lines, transformers, capacitors, switches, reclosers and vaults, at these locations, that together distribute power to PGE customers.

| <u>Property Description¹</u> | <u>Portland Harbor Trustee Designated Site ID</u> | <u>Address</u> | <u>Property ID</u> | <u>State ID</u> | <u>Multnomah County Alternate Tax No.</u> |
|---|---|---|--|--|--|
| Harborton Property and Substation | 45 | 12500 NW Marina Way And near 12430 NW St. Helens Rd. | R325467 R325472 R325470 R504043 R325468 R325474 | 2N1W3400100 2N1W3400300 2N1W3401000 2N1W3400800 2N1W3401100 2N1W3401800 | R971340100 R971340180 R971340160 R971340410 R971340130 R971340200 |
| Rivergate Substation and adjacent historic property | 47 | 8920 N. Time Oil Rd. 8849 N. Burgard Way 12299 N. Burgard Rd. | R325485 R325504 R325526 R325506 R325530 | 2N1W35B01700 2N1W35A00800 2N1W35D00200 2N1W35A00900 2N1W35D00100 | R971350100 R971350480 R971350730 R971350520 R971350750 |
| Wacker Substation | 125 | 7200 NW Front Ave. | R324183 R324219 | 1N1W1301200 1N1W13A00100 | R961130010 R961130480 |

¹ Properties are described by name, address and other identifying information, if available. Property addresses, lot lines, IDs and tax numbers may have changed over time. Property Id, State ID and Alternate Tax Numbers are provided if associated with the property.

| | | | | | |
|---|-----|---|---|---|--|
| | | | | | |
| Crawford St. Corporation Site (historic property (v)) | 126 | 8524 N. Crawford St. | R263881 R263877 R263876 R263878 R263880 R263874 R263875 | 1N1W12BD05500 1N1W12BD05900 1N1W12BD05800 1N1W12BD05700 1N1W12BD05600 1N1W12CA00200 1N1W12CA00300 | R739101320 R739100920 R739100840 R739101000 R739101160 R739100250 R739100380 |
| Pennwalt Substation (historical ownership) | 131 | 6400 NW Front Ave. | R553604 R553602 R553603 R553605 R553606 R553814 R531501 | 1N1W1300204 1N1W1300207 1N1W1300203 1N1W1300205 1N1W1300206 1N1W1300202 1N1W1300201 | R617400100 R617400010 R617400050 R617400150 R617400200 R961130590 R961130580 |
| Willbridge Substation | 148 | 6215 NW St. Helens Rd. 6333 NW St. Helens Rd. 6411 NW 64 th Ave. | R702526 R308300 R308301 R308311 R308310 R308302 R308291 R308303 R308292 R308299 R308295 R308297 R308294 | 1N1W13DB01401 1N1W13DB02200 1N1W13DB02300 1N1W13DB01900 1N1W13DB01800 1N1W13DB02400 1N1W13DB02500 1N1W13DB03200 1N1W13DB02600 1N1W13DB03100 1N1W13DC01500 1N1W13DB02900 1N1W13DB02700 | R64991 R915502150 R915502250 R915502750 R915502710 R915502300 R915501800 R915502310 R915501830 R915502130 R915501890 R915502010 R915501870 |
| Station N (historical ownership) | 155 | 5828 N. Van Houten Pl. | R315775 R248488 | 1N1E1800100 1N1E1800300 | R941180100 R669907720 |
| Zidell/Emery (historic property (ix)) | 181 | 4950, 5034, and 5200 NW Front | R315893 R238223 R315838 R238220 R238218 | 1N1E19A00100 1N1E19A00900 1N1E19A01500 1N1E19A01100 1N1E19A01000 | R941191230 R649741630 R941190540 R649741620 R649741610 |
| Yeon Property (historical ownership) | 193 | Near 4400 Block NW St. Helens Rd. southwest of junction of NW Yeon Ave. and NW St. Helens Rd. | R315857 R315880 | 1N1E19CA00100 1N1E19CA00200 | R941190770 R941191080 |

| | | | | | |
|---|------------------|--|--|--|--|
| Station E (historical ownership) | 220, 221, 229 | 2700 NW Front Ave. 2635 NW Front Ave. 2101 NW Reed St. | R316362 R316311 R269766 R269767 R269763 R269760 R269761 R269762 | 1N1E28B00600 1N1E28B00800 1N1E28BD00500 1N1E28BD00400 1N1E28CA03100 1N1E28CA03200 1N1E28CA03400 1N1E28CA03500 | R941280900 R941280300 R766003080 R766003120 R766002840 R766002720 R766002750 R766002800 |
| Swan Island Substation | 250 | 5500 N. Basin Rd. | R315598 | 1N1E16CC01900 | R941160200 |
| De Wolf Properties LLC (historical ownership) | 289 | 2303 N. Randolph Ave. | R102681 | 1N1E27CB01500 | R009616580 |
| Summit Properties (historic property (xii)) | 305 | 1462 NW Front Ave. (NW Naito Pkwy) | R298548 | 1N1E27CC00200 | R883803120 |
| Longview City Laundry (historic property (vi)) | 481, 528, 585 | 2801 NW Nela St. 2817 NW Nela St. 2950 NW 29 th Ave. 2900 NW 29 th Ave. | R316473 R316451 R316449 R316444 R316515 | 1N1E29AC00300 1N1E29AC00400 1N1E29AC00200 1N1E29AC00100 1N1E29AD01000 | R941291260 R941291110 R941291090 R941291040 R941291830 |
| Williams Cindy (historical ownership) | 620 | 3660 NW Front Ave. 3628 NW Front Ave. | R315957 R315944 | 1N1E20DD00300 1N1E20DD00100 | R941201040 R941200870 |
| Linnton Substation (historical ownership) | 629 | Intersection of NW Hoge Ave. and NW St. Helens Rd. | Unknown | Unknown | Unknown |
| Hawthorne Shop (historic ownership) | | 1510 SE Water Ave. | R275770 R275768 R275769 R275767 | 1S1E03DA1300 1S1E03DA1100 1S1E03DA01000 1S1E03DA01200 | R794001000 R794000920 R794000990 R794000900 |
| Station L (historic ownership) | | 1945 SE Water Ave. 1701 SE Water Ave. 211 SE Caruthers St. | R504993 R326765 R326764 R326759 R326766 R326758 R490515 | 1S1E03D00101 1S1E03D00100 1S1E03D00200 1S1E03D00500 1S1E03D00400 1S1E03D00300 1S1E03D00301 | R991030800 R991030760 R991030750 R991030700 R991030770 R991030690 R991030790 |

| | | | | | |
|---|--|---|---|---|--|
| | | 2015 SW Water Ave. 2201 SE 2 nd Pl. | R247366 R247367 R247368 R247369 R657640 R657638 R657639 | 1S1E03DD00600 1S1E03DD00500 1S1E03DD00200 1S1E03DD00300 1S1E03DD00301 1S1E03DD00202 1S1E03DD00203 | R668200050 R668200100 R668200150 R668200200 R668200210 R668200170 R668200180 |
| Fulton Substation (historic ownership) | | 0540 SW Nevada St. (540 S. Nevada St.) | R590739 R582379 | 1S1E22BD80000 1S1E22BD00101 | R521900010 R649862490 (historic boundary does not correspond exactly to modern tax lot) |
| Jefferson Substation (historic ownership) | | 1236 SW 1 st Ave. | R681278 | 1S1E03BD03500 | R667701394 |
| Riverview Substation and adjacent historic property | | Near 600 SW Taylors Ferry Rd. and 7606 SW Fulton Park Blvd. | R330295 R330286 R167136 R330318 | 1S1E22BD05300 1S1E22BD05400 1S1E22BD05700 1S1E22BD05500 | R991220330 R991220190 R300405510 R991220590 |
| Rose City Core Building | | 3100 NW Industrial St. | R174627 | 1N1E29CA00600 | R347600340 |
| Stephens Substation | | 1830 SE Water Ave. | R326733 | 1S1E03DA04400 | R991030210 |
| World Trade Center | | 121 SW Salmon St. 25 SW Salmon St. 26 SW Salmon St. | R245931 R245917 R245918 | 1S1E03BA02100 1S1E03BA00200 1S1E03BD00200 | R667702030 R667700830 R667700970 |
| Marquam Substation | | 2521 S. Water Ave | R128841 | 1S1E10BA05000 | R140905240 |
| Historic Property (ii) | | 2611 SE 4 th Ave. | R197256 | 1S1E10AA00600 | R448700650 |
| Historic Property (iii) | | 101 through 119 SW Main and 1031 through 1037 SW 1 st Ave. | R245930 | 1S1E03BD00300 | R667701850 |

| | | | | | |
|--------------------------|----------|---|-------------------------------|---|--|
| Historic Property (vii) | 189, 205 | 3710 NW Front 3657 NW Front | R315900 R315954 | 1N1E20DD00200 1N1E20DD00400 | R941200060 R941200980 |
| Historic Property (viii) | | 7560 and 7568 SW La View Dr. (7560 and 7568 S. La View Dr.) | R166807 R167128 | 1S1E22BD06100 1S1E22BD06000 | R300100540 R300405390 |
| Historic Property (x) | | Near SW Montgomery St. and SW Water Ave | Unknown | Unknown | R77750310 |
| Historic Property (xi) | | Northeast Corner of SW 1 st and SW Alder St. | R245899 | 1S1E03BA01000 | R667700010 |
| Historic Property (xiii) | 289 | Near N. Loring and N. Randolph 2303 N. Randolph | R102681 | 1N1E27CB01500 | R009616580 |
| Historic Property (xiv) | | Near SE Main and SE Water St. | R676298 | 1S1E03AD03603 | R649672090 |
| Historic Property (xv) | | Between SW 1 st Ave. and 2 nd on SW Ash St. | R246026 R246021 R246025 | 1N1E34CD01800 1N1E34DC02400 1N1E34CD01900 | R667704300 R667704220 R667704280 |
| Historic Property (xvi) | | SW Macadam, Fulton District, Near SW Miles Pl. | R330343 | 1S1E22AC04800 | R991220920 |

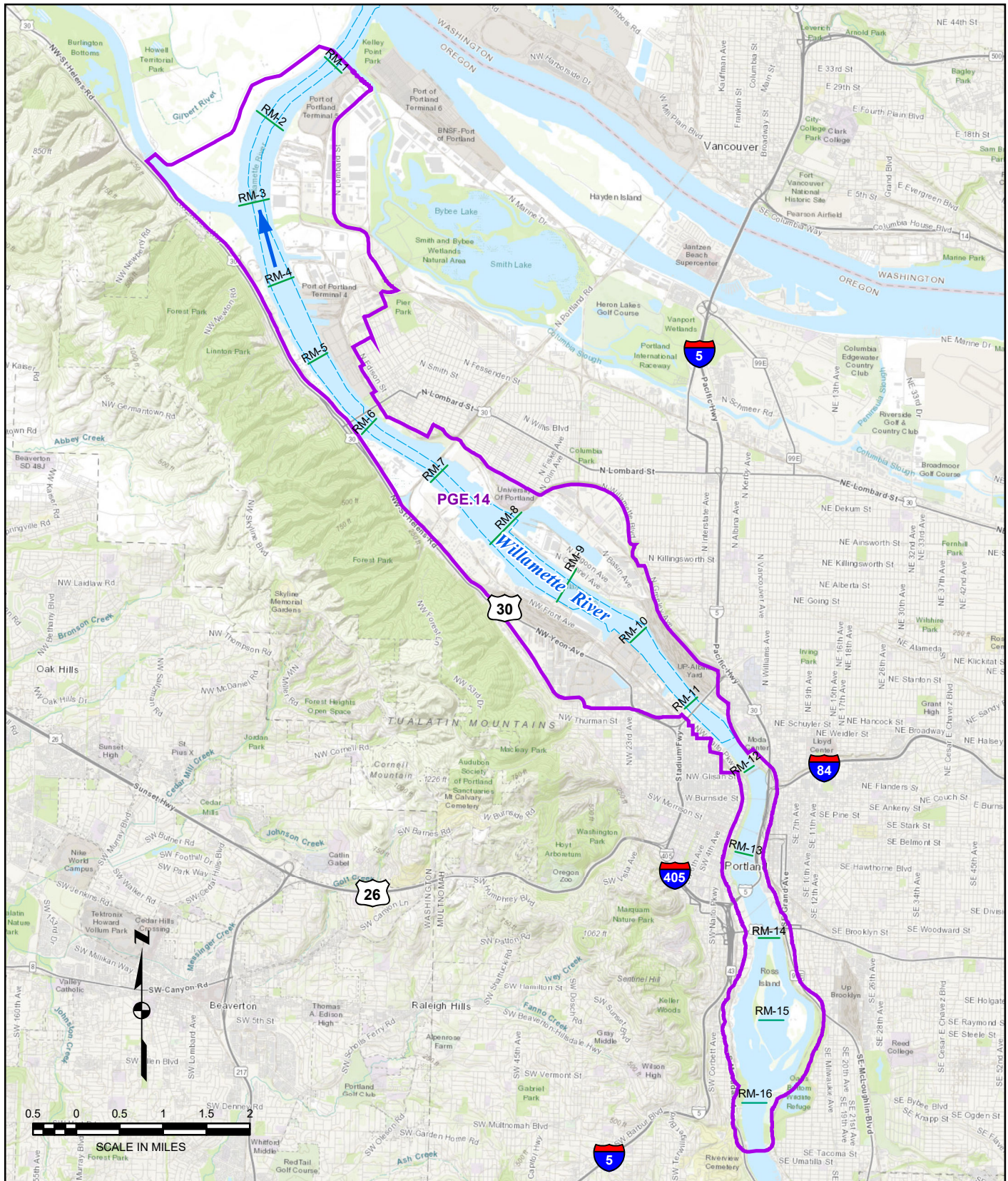
Part II: Map of Portland General Electric Company Distribution Network

In addition to the real properties specified in Part I of this Appendix A where PGE distribution network equipment and property may be or was historically located on properties currently or formerly owned or operated by PGE, maps of the distribution transformers (network, overhead, and underground), cable crossings, and PGE current and historical properties within the PGE Distribution Network Area Boundary are provided as Exhibits A-1 and A-2 to this Appendix A. The equipment indicated in Exhibit A-2, and all poles, towers, transmission and distribution lines, submerged or underground cables and lines, transformers, capacitors, switches, reclosers, vaults and other PGE equipment located within the PGE Distribution Network Area Boundary indicated on the map in Exhibit A-1 but not specifically indicated in Exhibit A-2, are included within this Appendix A. This Appendix A includes all releases of hazardous substances or pollutants from that equipment or activities associated with that equipment (including

but not limited to: installation, use, maintenance, and replacement or removal of equipment; spill response; and periodic removal of water accumulated in vaults).

Part III: Activities and releases

In addition to releases of hazardous substances or pollutants from real properties specified in Part I of this Appendix A, and from the distribution network transformers and other equipment identified in Part II of this Appendix A, Part III of this Appendix A is a table of spills and releases covering the period between July 1979 and September 2020 from PGE's distribution network, submerged cables and miscellaneous activities, described as "PGE Total Distribution Network Equipment and Related Spills and Releases within the PGE Distribution Network Area Boundary" in Exhibit A-3 to this Appendix A. In addition to the spills identified in Exhibit A-3, this Appendix A also includes releases of hazardous substances or discharges of pollutants from spills prior to July 1979 within the PGE Distribution Network Area Boundary shown in Exhibit A-1.



Sources: ESRI 2019 – ArcGIS Data Basemaps.pdf; AEGIS 2020 – DC736 FFIDs.pdf; APGIS 2019 – DC1019 Willamette Navigation.pdf.

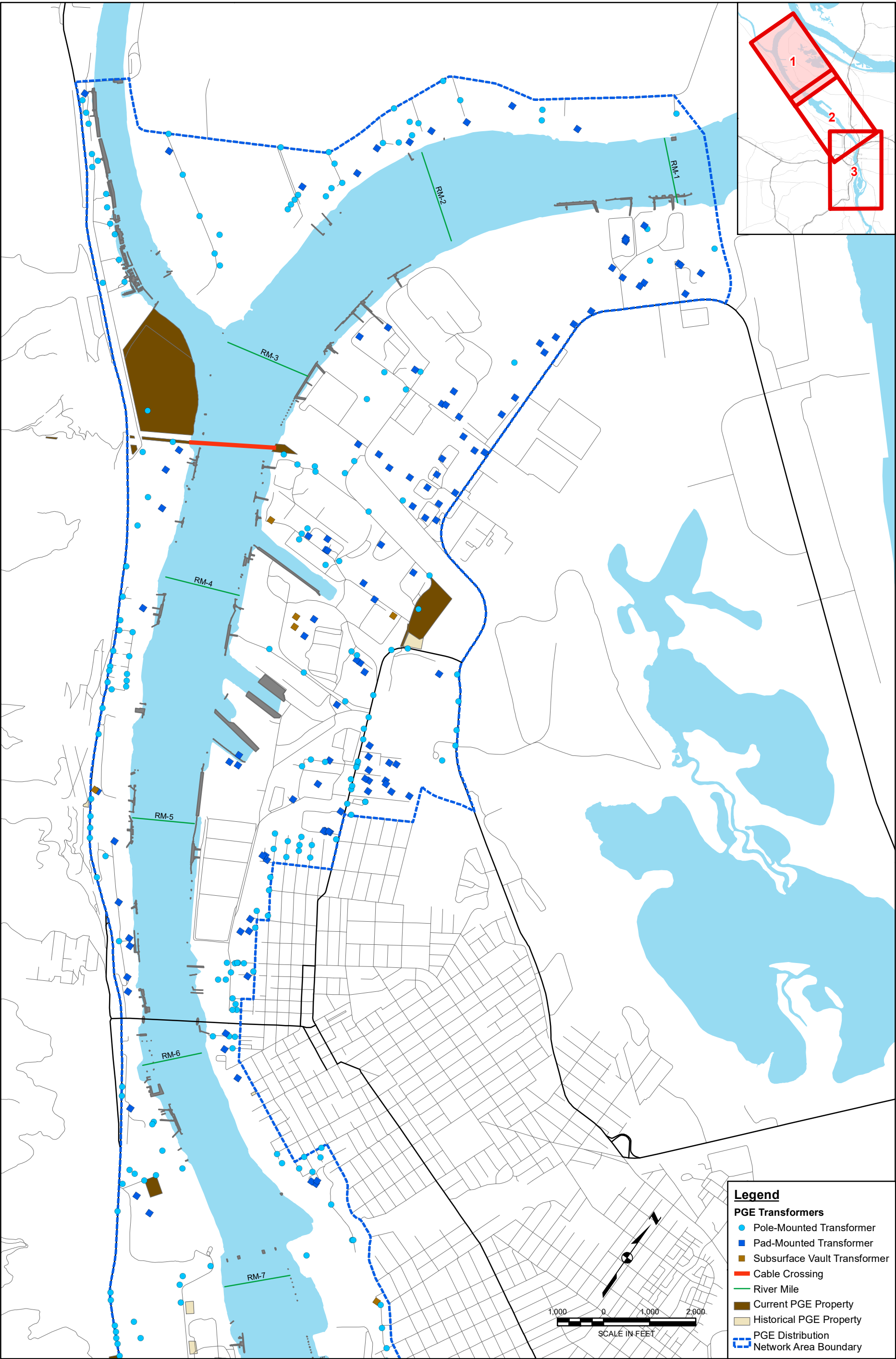
Legend

- River Flow Direction
- River Mile
- PGE Distribution Network
- Area Boundary
- Navigation Channel

Exhibit A-1

PGE DISTRIBUTION
NETWORK AREA BOUNDARY
PORTLAND, OREGON

JUNE 2022

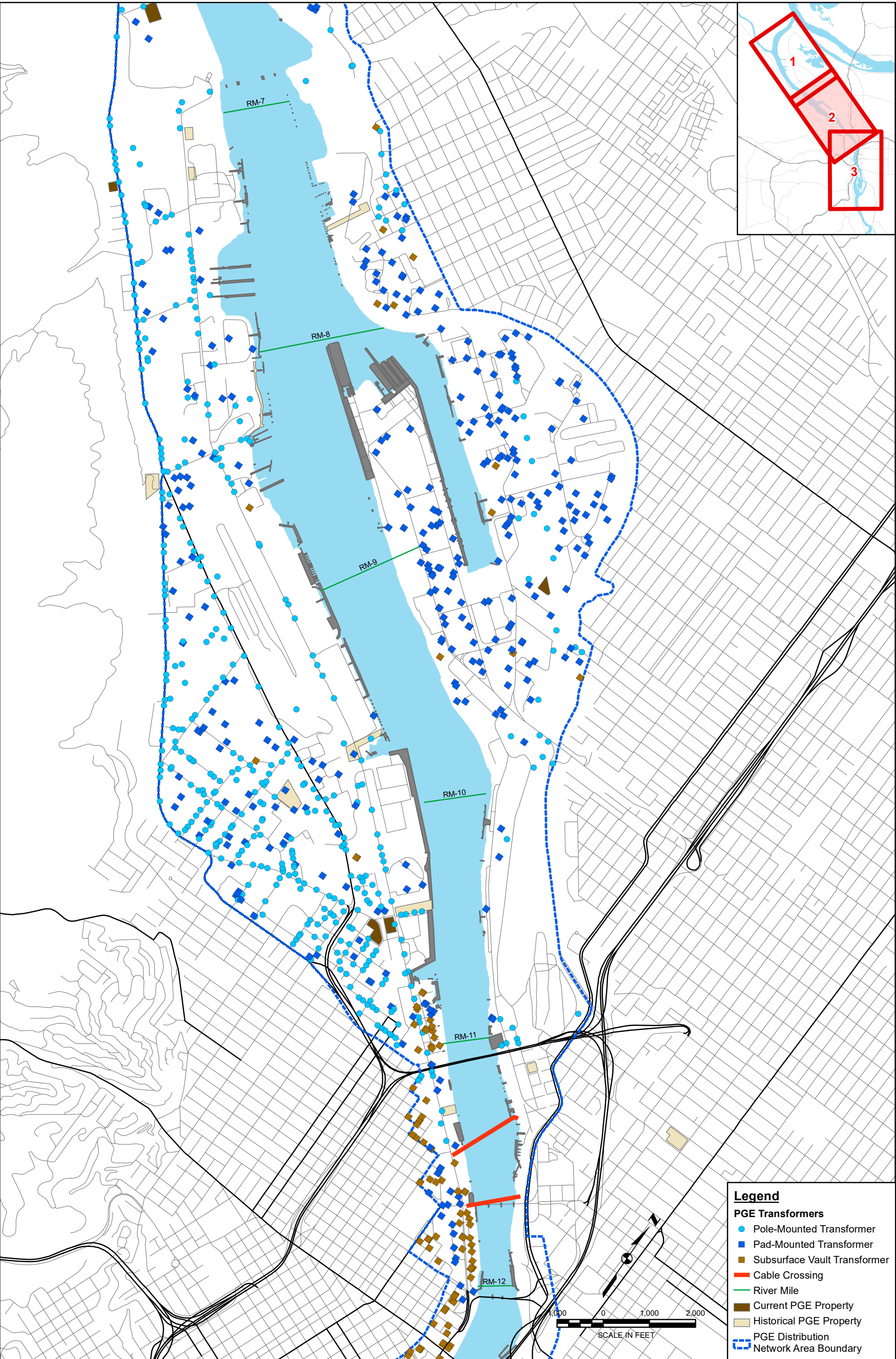


Sources: PGE0163453 (RLIS Data, 06/28/2019); River Miles Lines, 2011 (DC 47);
Willamette River Navigation Channel, 5/15/2019 (DC 1019);
TPA RM10W Expert Report at Appendix I (Table A1);
PGE0247893 (Portland Transformer Inventory, 03/2020);

Exhibit A-2

PGE TRANSFORMERS,
EQUIPMENT AND PROPERTIES
PORTLAND, OREGON

JUNE 2022

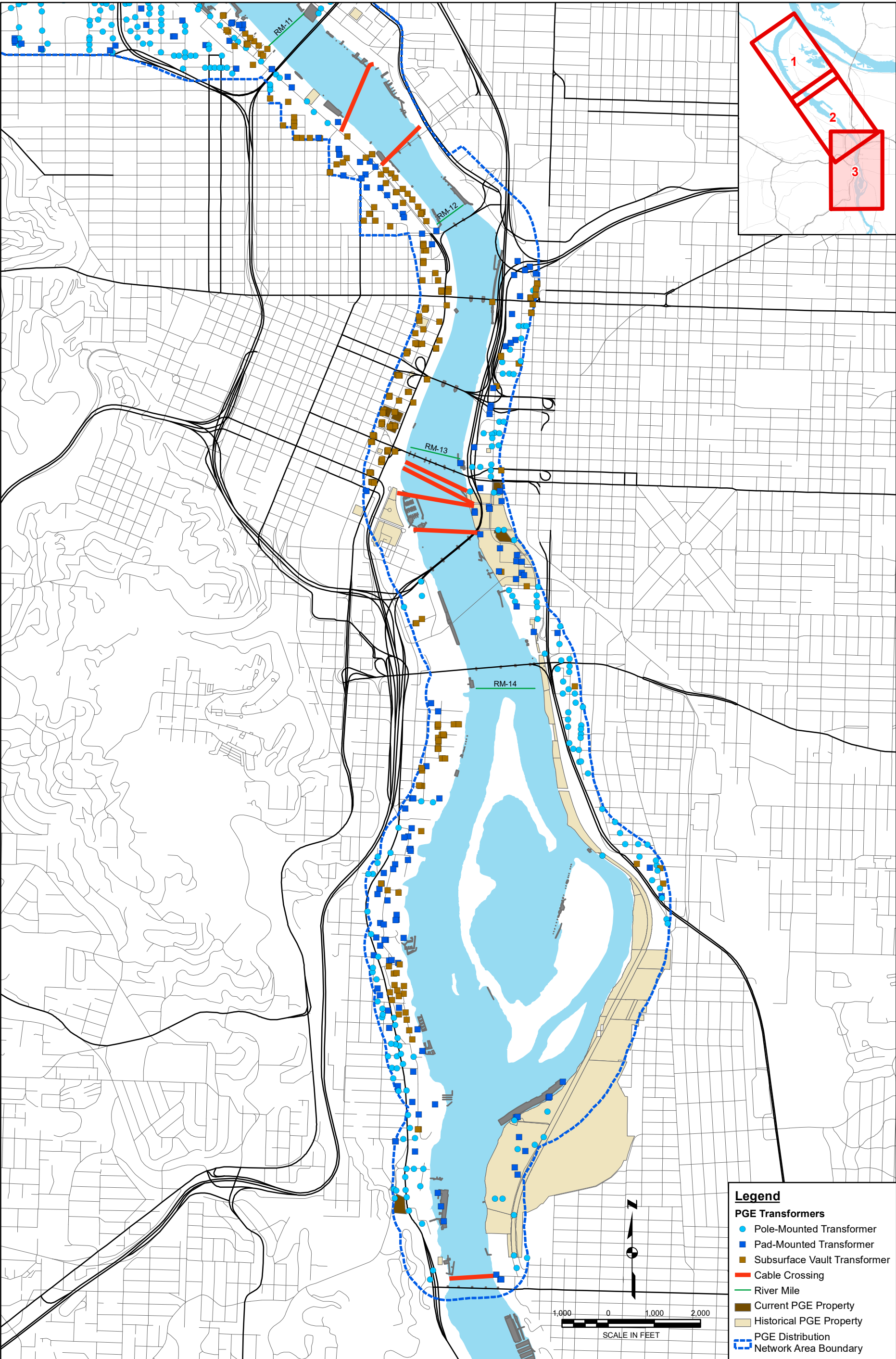


Sources: PGE0163453 (RLIS Data, 06/28/2019); River Miles Lines, 2011 (DC 47);
Willamette River Navigation Channel, 5/15/2019 (DC 1019);
TPA RM10W Expert Report at Appendix I (Table A1);
PGE0247893 (Portland Transformer Inventory, 03/2020);

Exhibit A-2

PGE TRANSFORMERS,
EQUIPMENT AND PROPERTIES
PORTLAND, OREGON

JUNE 2022



Sources: PGE0163453 (RLIS Data, 06/28/2019); River Miles Lines, 2011 (DC 47);
Willamette River Navigation Channel, 5/15/2019 (DC 1019);
TPA RM10W Expert Report at Appendix I (Table A1);
PGE0247893 (Portland Transformer Inventory, 03/2020);

Exhibit A-2

PGE TRANSFORMERS,
EQUIPMENT AND PROPERTIES
PORTLAND, OREGON

JUNE 2022

Exhibit A-3: PGE Total Distribution Network Equipment and Related Spills and Releases within the PGE Distribution Network Area Boundary 1979–September 2020

| Spill Date | Street Address | Spill Equipment Type | Quantity Spilled (gallons) ¹ | PCB Content of Spill (ppm) ² | Spill Description | Overwater Spill | Oil Entered Storm Drain | PCB Content Unknown, Non-PCB, or < 50 ppm | Quantity Spilled Unknown |
|------------|--|----------------------|---|---|---|-----------------|-------------------------|---|--------------------------|
| 1979-07-06 | Linnton Plywood | Transformer | 0.25 | | A transformer located on a piling 100 feet into the Willamette River cracked and leaked into the river. PGE called Western Environmental Services to clean up the spill and no oil was found on the water. PGE subsequently relocated the transformer bank to land. | Yes | No | Yes | No |
| 1984-04-10 | NW 109th & St. Helens Road | Transformer | 35 | 53 | A public vehicle hit a power pole causing a pole-mount transformer to spill its contents into the street and most of the oil entered the combined storm/sanitary drain. | No | Yes | No | No |
| 1985-10-04 | NW 25th and Nicolai St | Transformer | 0.125 | Non-PCB | A non-PCB transformer spilled 1 pint of its contents. | No | No | Yes | No |
| 1985-11-25 | Basin St. on Swan Island | Transformer | 10 | 18 | A transformer spilled oil but it did not flow to any storm drains. | No | No | No | No |
| 1986-03-04 | Near 200 SE Spokane (Sellwood Moorage) | Transformer | 5 | 5 | During flooding, 19 houseboats broke from their moorage. Top bushings on transformers located on the dock ruptured and leaked into the river. | Yes | No | No | No |
| 1986-03-15 | 3245 N Willamette Blvd | Transformer | 20 | 40 | A public vehicle hit a power pole causing a pole-mount transformer to spill its contents. All oil went into the storm drain. | No | Yes | No | No |
| 1986-05-05 | 3300 NW Yeon | Transformer | 1 | Non-PCB | A non-PCB pad-mount transformer leaked at Schnitzer Steel. | No | No | Yes | No |
| 1986-05-06 | 12005 N Burgard | Transformer | 1 | Non-PCB | A non-PCB pad-mount transformer leaked at Palmco Oil. | No | No | Yes | No |
| 1986-06-12 | 8200 SW Macadam | Transformer | 5 | 26 | A pole-mount transformer spilled oil onto the sidewalk. | No | No | No | No |
| 1986-06-26 | NW Yeon E of Expressway | Other - Truck | 15 | Non-PCB | A PGE line truck spilled hydraulic oil on new sub-grade. | No | No | No | No |
| 1986-07-23 | 2000 NW Wilson | Transformer | 1 | 11 | A 300 kVa pad-mount transformer leaked. | No | No | No | No |
| 1986-08-09 | 120 SW Columbia St. | Capacitor | 1 | Non-PCB | A non-PCB capacitor spilled oil. | No | No | No | No |
| 1986-08-21 | 2 blocks south of NW 26th and Yeon | Other - Truck | 3 | Non-PCB | A PGE line truck spilled hydraulic oil onto public property. | No | No | No | No |
| 1986-09-04 | 3059 NW Yeon | Other - Truck | 5 | Non-PCB | A PGE bucket truck spilled hydraulic oil onto the roof and exterior wall of a Goodyear Rubber building. | No | No | No | No |
| 1987-04-14 | SW Macadam N of Sellwood Bridge | Other - Truck | 3 | Non-PCB | A PGE line truck spilled hydraulic oil onto public roadway. | No | No | No | No |
| 1987-06-04 | NW 30th Ave and St. Helens Road | Other - Truck | 4 | Non-PCB | A PGE line truck spilled hydraulic oil onto a private driveway. | No | No | No | No |
| 1987-06-24 | 4900 SW Landing Dr | Transformer | 1 | <1 | A pad-mount transformer spilled oil onto soil and pad. | No | No | No | No |
| 1988-08-05 | 2335 NW 29th | Transformer | 0.125 | 12 | A transformer spilled onto public street. | No | No | No | No |
| 1988-12-02 | 5400 N Basin | Transformer | 20 | 30 | A pole-mount transformer leaked from a bullet hole onto gravel and a private vehicle below. | No | No | No | No |
| 1989-01-19 | 12005 North Burgard | Transformer (3) | 20 | <1 | A truck hit a pole causing three pole-mount transformers to spill oil onto the street. Lab analysis of oil reported as less than 1 ppm PCBs. | No | No | No | No |
| 1989-05-16 | 4705 NW Front | Transformer | 0.25 | Non-detect | A transformer spilled oil onto asphalt. Lab analysis of oil did not detect PCBs. | No | No | No | No |
| 1990-04-24 | 5949 N Basin | Transformer | 75 | Non-detect | A transformer malfunctioned and sprayed oil over the surrounding area. Some oil was transported to a drain to pump station and then to treatment plant; not the Willamette River. Lab analysis of oil did not detect PCBs. | No | Yes; not river | No | No |

Exhibit A-3: PGE Total Distribution Network Equipment and Related Spills and Releases within the PGE Distribution Network Area Boundary 1979–September 2020

| Spill Date | Street Address | Spill Equipment Type | Quantity Spilled (gallons) ¹ | PCB Content of Spill (ppm) ² | Spill Description | Overwater Spill | Oil Entered Storm Drain | PCB Content Unknown, Non-PCB, or < 50 ppm | Quantity Spilled Unknown |
|------------|--|----------------------|---|---|--|-----------------|-------------------------|---|--------------------------|
| 1990-06-05 | 3325 NW Yeon | Transformer | 2 | 5 | A pole-mount transformer spilled onto the street, a private vehicle, and one person. A pole fire occurred. | No | No | No | No |
| 1990-08-27 | 5617 N Basin | Transformer | 10 | 10 | A pad-mount transformer spilled at Island Leasing Corp. | No | No | No | No |
| 1990-10-24 | Swan Island north of Kittridge/Leverma | Capacitor bank | 3 | Non-PCB | Multiple pole-mount non-PCB capacitors leaked oil onto vegetation. | No | No | No | No |
| 1990-11-24 | 2727 NW 29th | Capacitor | 2 | Non-PCB | Non-PCB capacitor spilled oil onto asphalt and caught on fire. | No | No | No | No |
| 1991-01-30 | 4927 NW Front | Transformer | 1 | <1 | A transformer was dripping oil onto asphalt and soil. Sticker indicated PCB content of less than 1 ppm. | No | No | No | No |
| 1991-04-24 | 110 SE Caruthers | Transformer | 2 | 36 | A pole-mount transformer leaked oil onto pole, soil, and vegetation. | No | No | No | No |
| 1991-07-23 | 290 SE Spokane | Transformer | 5 | <50 | A pad-mount transformer leaked oil onto pad and vegetation. | No | No | Yes | No |
| 1991-10-23 | 9300 N Columbia | Capacitor | 2 | Non-PCB | Non-PCB pole-mount capacitor spilled oil. | No | No | No | No |
| 1991-10-31 | SE Madison and Water | Transformer | 14 | 15 | A transformer leaked oil onto asphalt and two private vehicles. | No | No | No | No |
| 1992-06-23 | 3232 NW Industrial | Transformer (3) | 10 | Non-detect | Three transformers spilled onto soil/bark dust and asphalt. Lab analysis of oil did not detect PCBs. | No | No | No | No |
| 1992-07-30 | Water Ave and Belmont | Other - Truck | 4 | Non-PCB | A PGE line truck spilled hydraulic oil onto the asphalt of a public street. | No | No | No | No |
| 1992-12-17 | 7540 NW St. Helens | Other - Unknown | 22 | Non-PCB | A hydraulic spill from an unknown source contaminated 4,000 square feet of water, soil, and asphalt. | No | No | No | No |
| 1993-02-26 | 2181 NW Nicolai | Transformer | 2 | <1 | One transformer spilled oil onto soil and gravel. Sticker indicated PCB content of less than 1 ppm. | No | No | No | No |
| 1993-02-26 | 2181 NW Nicolai | Transformer | 3 | <1 | One transformer spilled oil onto soil and gravel. Sticker indicated PCB content of less than 1 ppm. | No | No | No | No |
| 1993-06-11 | SW Madison and SW 2nd | Transformer | 5 | 5 | PGE crews cleaned up oil. | No | Yes | No | No |
| 1993-08-11 | NW 6th and Johnson St | Other - Vault cable | 0.0625 | Non-PCB | Spill was contained in vault (V18), no cleanup required. Paper insulated lead covered (PILC) cable paper is saturated with oil, which may or may not contain PCBs. | No | No | Yes | No |
| 1993-09-03 | 2900 NW 29th Ave | Transformer | 0.03125 | 3 | A pole-mount transformer leaked oil on the sidewalk and a car. | No | No | No | No |
| 1993-10-12 | 3900 NW Yeon | Transformer | 2 | 38 | A pole-mount transformer malfunctioned and spilled oil onto asphalt, sidewalk, and railroad tracks. Oil entered a storm drain. | No | Yes | No | No |
| 1994-02-14 | SE Caruthers and 3rd Ave | Transformer | 5 | <1 | A pole-mount transformer leaked oil onto asphalt and private vehicles. Lab analysis of oil reported as less than 1 ppm PCBs. | No | No | No | No |
| 1994-07-06 | 3003 NW 35th | Transformer | 4 | 9 | A transformer spilled oil onto cement. | No | No | No | No |
| 1994-07-12 | NW 31st and Luzon | Transformer | 0.1 | 48 | A pole-mount transformer spilled oil onto asphalt. | No | No | No | No |
| 1994-07-14 | 0225 SW Montgomery | Other - Vault cable | 0.25 | Non-PCB | A cable-splice released a tar-like substance into a vault. | No | No | No | No |
| 1994-12-13 | 3 Spans South of N Ensign | Other - Equipment | 2 | Non-PCB | A PGE hole digger spilled hydraulic oil onto soil. | No | No | No | No |
| 1994-12-21 | E of Ensign Street at Swan Island | Other - Truck | 20 | Non-PCB | A PGE boom truck spilled hydraulic oil onto soil at railroad tracks and puddle of water. | No | No | No | No |

Exhibit A-3: PGE Total Distribution Network Equipment and Related Spills and Releases within the PGE Distribution Network Area Boundary 1979–September 2020

| Spill Date | Street Address | Spill Equipment Type | Quantity Spilled (gallons) ¹ | PCB Content of Spill (ppm) ² | Spill Description | Overwater Spill | Oil Entered Storm Drain | PCB Content Unknown, Non-PCB, or < 50 ppm | Quantity Spilled Unknown |
|------------|--|----------------------|---|---|--|-----------------|-------------------------|---|--------------------------|
| 1995-04-08 | N Columbia and N Burgard | Transformer (4) | 10 | 43 | A vehicle hit a transformer pole causing it to break and then bring down three other poles. Four transformers ruptured and spilled oil onto asphalt and soil. About 10 gallons flowed into a storm drain and then to a pond. About 25 gallons spilled to the street. Lab analysis of oil in one transformer (15 kVA #3733) had 43 ppm PCBs and the oil other three transformers did not detect PCBs. | No | Yes; not river | No | No |
| 1995-08-06 | NW 21 Ave and Wilson | Other - Truck | 10 | Non-PCB | A PGE line truck spilled hydraulic oil onto asphalt and into storm drain. | No | No | No | No |
| 1995-08-23 | 3200 NW Yeon | Transformer | 1 | --- | A transformer leaked oil onto its concrete pad. PCB content is unknown. | No | No | Yes | No |
| 1995-09-27 | 4315 SE McLoughlin Blvd at railroad tracks | Other - Oil | 20 | Non-PCB | Hydraulic oil spilled onto soil. | No | No | No | No |
| 1995-11-01 | 3200 SE McLoughlin | Transformer | 0.125 | <1 | A transformer leaked oil on soil. Sticker indicated PCB content of less than 1 ppm. | No | No | No | No |
| 1996-02-01 | 3055 NW 29th Ave | Transformer | 0.0625 | 22 | A transformer spilled oil onto soil, asphalt, bushes, and seven vehicles. | No | No | No | No |
| 1996-02-16 | NW 9th and Front | Other - Train | 20 | Non-PCB | Non-PGE spill. Diesel fuel spilled from train and migrated into a PGE vault. | No | No | No | No |
| 1996-04-30 | 1626 SE Water | Transformer | 1 | 15 | A pad-mount transformer spilled oil onto sand. | No | No | No | No |
| 1996-05-03 | 3930 NW Yeon | Transformer | 0.004 | 15 | A transformer spilled oil onto soil. | No | No | No | No |
| 1996-05-24 | 3319 NW Yeon | Transformer | 2.5 | <1 | A pole-mount transformer spilled oil onto asphalt and ivy. Sticker indicated PCBs of less than 1 ppm. | No | No | No | No |
| 1996-07-01 | 3250 NW St Helens Rd | Transformer | 15 | <1 | While filling a transformer with oil, oil overflowed and spilled onto asphalt. Sticker indicated PCBs of less than 1 ppm. | No | No | No | No |
| 1996-07-23 | 7521 N Edgewater | Transformer | 0.125 | <1 | No description is available. | No | No | No | No |
| 1996-07-26 | 2000 NW Wilson | Transformer | 1.5 | 14 | A transformer spilled oil onto soil and concrete pad. | No | No | No | No |
| 1996-08-01 | 1212 NW 9th Ave | Other - Unknown | 1.5 | Non-PCB | No description is available. | No | No | No | No |
| 1997-04-14 | HWY 30 and Marina Way | Capacitor | 0.25 | Non-PCB | Capacitor malfunctioned and vegetation was impacted by release. Lab analysis of oil did not detect PCBs. | No | No | No | No |
| 1997-12-01 | 5400 N Basin | Transformer | 3 | <1 | A transformer spilled oil onto asphalt. Sticker on transformer and lab analysis indicated PCBs of less than 1 ppm. | No | No | No | No |
| 1998-01-09 | 2279 NW Front | Other - Diesel | --- | Non-PCB | Diesel spilled to soil from an unknown source. | No | No | No | Yes |
| 1998-02-27 | 6941 N Roberts | Transformer | 5 | 260 | A transformer spilled oil onto soil, asphalt, and ten vehicles. | No | No | No | No |
| 1998-03-31 | 2603 SE Grand Ave | Transformer | 2 | <1 | A pole-mount transformer malfunctioned and spilled oil onto the asphalt and sidewalk, and into a storm drain. Sticker indicated PCBs of less than 1 ppm. | No | Yes | No | No |
| 1998-04-30 | N Columbia Blvd. and Lombard | Other - Truck | 14 | Non-PCB | A PGE truck spilled hydraulic oil onto soil outside Rivergate Substation. | No | No | No | No |
| 1999-02-19 | 10400 N Burgard Way | Transformer | 1 | 7 | A transformer spilled oil from its vault (V2736) onto soil and into a ditch. | No | No | No | No |
| 1999-03-09 | 15540 N Lombard | Transformer | 0.5 | 48 | No description is available. | No | No | No | No |

Exhibit A-3: PGE Total Distribution Network Equipment and Related Spills and Releases within the PGE Distribution Network Area Boundary 1979–September 2020

| Spill Date | Street Address | Spill Equipment Type | Quantity Spilled (gallons) ¹ | PCB Content of Spill (ppm) ² | Spill Description | Overwater Spill | Oil Entered Storm Drain | PCB Content Unknown, Non-PCB, or < 50 ppm | Quantity Spilled Unknown |
|------------|-------------------------------------|----------------------|---|---|---|-----------------|--|---|--------------------------|
| 1999-04-09 | 8435 N Crawford | Transformer | 3 | 52 | A pole-mount transformer spilled oil onto soil, cement, and truck parts. | No | No | No | No |
| 1999-05-19 | 11080 NW St. Helens Rd | Transformer (2) | 20 | 14 | Traffic accident caused release of oil from two transformers. | No | Yes; Columbia River or Treatment Plant | No | No |
| 1999-07-22 | 1225 SE Holgate Blvd | Transformer | 30 | Non-PCB | A transformer spilled oil onto asphalt, vegetation, and concrete. | No | No | Yes | No |
| 1999-08-10 | 9420 NW St. Helens Rd | Other - Equipment | 0.125 | Non-PCB | Hydraulic oil spilled onto asphalt. | No | No | No | No |
| 1999-10-04 | 5555 N Channel Ave | Transformer | 0.125 | <1 | A pole-mount transformer spilled oil onto concrete and gravel. Sticker indicated PCBs of less than 1 ppm. | No | No | No | No |
| 1999-12-14 | 600 NW Naito | Transformer (3) | 21 | No oil spill | A train derailment west of the Steel Bridge caused a fire at three transformers. The meter base burned but not the transformers. No spilled oil was observed by PGE. | No | No | No | No |
| 1999-12-15 | 720 NW Front | Transformer | 0.125 | <1 | A transformer leaked oil onto soil. Sticker indicated PCBs of less than 1 ppm. | No | No | No | No |
| 2000-03-16 | 10200 N Lombard | Transformer | 0.5 | 48 | No description is available. | No | No | No | No |
| 2000-10-07 | NW 1 Ave and Flanders | Transformer | 0.5 | <1 | A transformer spilled on soil. Sticker indicated PCBs of less than 1 ppm. | No | No | No | No |
| 2000-12-04 | NW 23 Pl and Nicolai | Other - Truck | 20 | Non-PCB | A PGE boom truck spilled hydraulic oil onto asphalt. | No | No | No | No |
| 2001-12-11 | SW Main St between 1 and 2 Ave | Transformer | 0.0634 | <1 | A pole-mount transformer spilled oil onto asphalt and sidewalk. Sticker indicated PCBs of less than 1 ppm. | No | No | No | No |
| 2002-03-14 | NW 17th and Thurman | Other - Truck | 1 | Non-PCB | A PGE line truck spilled hydraulic oil. | No | No | No | No |
| 2002-05-07 | 2800 NW 29TH Ave | Transformer (6) | 65 | 32 | A Freightliner truck backed into a pole causing six transformers to spill onto asphalt and into a storm drain. | No | Yes | No | No |
| 2003-05-04 | 5688 or 6688 NW St. Helens Road | Transformer (3) | 2 | <1 | A tree fell and hit three transformers causing oil to spill onto asphalt, gravel, and vegetation. The oil was confined to the embankment and did not reach waterways. | No | No | No | No |
| 2003-05-23 | 2701 NW Vaughn (Montgomery Park) | Transformer | 3 | 5 | A transformer released oil into a vault (V5523). PGE personnel cleaned up spill by surface cleaning and removing 1 yard of soil. | No | No | No | No |
| 2003-07-28 | 3601 NW Yeon | Transformer | 0.25 | <1 | A pole-mount transformer spilled oil onto soil, concrete, and cars. Sticker indicated PCBs of less than 1 ppm. | No | No | No | No |
| 2003-07-31 | 2344 NE 21 Place | Transformer | 0.5 | <1 | A pole-mount transformer spilled oil onto asphalt and a car. Sticker indicated PCBs of less than 1 ppm. | No | No | No | No |
| 2003-09-02 | 2800 NW Front Ave | Transformer | -- | <1 | A transformer spilled oil onto gravel. Sticker indicated PCBs of less than 1 ppm. | No | No | No | Yes |
| 2003-12-16 | Greeley and Going (on the Hwy Ramp) | Transformer | 20 | <1 | A pole-mount transformer spilled oil onto asphalt. Sticker indicated PCBs of less than 1 ppm. | No | No | No | No |
| 2004-01-14 | 1800 NW 16th Ave | Transformer | 5 | 39 | A pole-mount transformer malfunctioned leaking oil onto the asphalt and soil, and into a storm drain. | No | Yes | No | No |

Exhibit A-3: PGE Total Distribution Network Equipment and Related Spills and Releases within the PGE Distribution Network Area Boundary 1979–September 2020

| Spill Date | Street Address | Spill Equipment Type | Quantity Spilled (gallons) ¹ | PCB Content of Spill (ppm) ² | Spill Description | Overwater Spill | Oil Entered Storm Drain | PCB Content Unknown, Non-PCB, or < 50 ppm | Quantity Spilled Unknown |
|------------|---|----------------------|---|---|---|-----------------|-------------------------|---|--------------------------|
| 2005-04-15 | 6936 Fathom Street | Other - Unknown | -- | Non-PCB | NRC Environmental Services pumped out PGE's vault found to contain diesel and water. The "spill" refers to the fact that diesel was found in vault water, likely related to a leaking diesel UST that was removed on 4/26/2005. The 2,433 gallons of waste water was transported to Cascade General for disposal. | No | No | No | Yes |
| 2005-08-30 | NW 12th Ave & NW Overton St | Other - Paint | -- | Non-PCB | No description is available. | No | No | No | No |
| 2005-10-14 | N Greeley and Going St | Other - Truck | 2 | Non-PCB | A PGE line truck spilled hydraulic oil onto asphalt, soil, and a line truck. | No | No | No | No |
| 2007-01-12 | Corner of McLoughlin & SE Long | Transformer | 37 | 66 | A transformer spilled oil onto soil. | No | No | No | No |
| 2007-03-14 | 8424 N Crawford St | Transformer | 1 | <1 | A pole-mount transformer spilled oil onto soil and concrete curb. Sticker indicated PCBs of less than 1 ppm. | No | No | No | No |
| 2007-07-04 | 5828 N Van Houten | Transformer (3) | 30 | <1 | Vandals caused three pole-mount transformers to spill oil onto soil. Lab analysis indicated PCBs of less than 1 ppm. | No | No | No | No |
| 2007-07-11 | 8970 N Bradford St | Transformer (3) | 200 | 30 | Vandals knocked three pole-mount transformers to the ground spilling oil onto asphalt, soil, and vegetation. | No | No | No | No |
| 2007-12-01 | 202 SE Stark St | Transformer | 1 | <1 | A vehicle-strike caused a pole-mount transformer to spill oil onto asphalt, soil, and cement. Sticker indicated PCBs of less than 1 ppm. | No | No | No | No |
| 2008-04-04 | 2017 NW Vaughn | Other - Equipment | 15 | Non-PCB | A hole digger spilled hydraulic oil onto asphalt. Heavy rains caused some of the oil (no PCBs) to flow into a storm drain. | No | No | No | No |
| 2008-06-16 | 6707 N Basin | Transformer | 336 | <1 | A transformer fire leaked oil into concrete vaults 33 and 32 (at Pad 47). Transformer oil was not released into the environment. Sticker indicated PCBs of less than 1 ppm. | No | No | No | No |
| 2008-08-27 | 2728 NW Nela St | Transformer (2) | 2 | 24 | Two transformers leaked oil onto asphalt and concrete. Lab analysis indicated PCB content of 11 ppm and 24 ppm. | No | No | No | No |
| 2008-12-05 | 6635 N Baltimore Ave | Transformer | 1 | <1 | A transformer leaked oil onto asphalt and soil. Sticker indicated PCBs of less than 1 ppm. | No | No | No | No |
| 2009-01-07 | Behind 4750 N. Princeton | Other - Oil | -- | Non-PCB | No description is available. | No | No | No | No |
| 2009-06-17 | SW 2nd & Madison | Other - Truck | 10 | Non-PCB | PGE line truck spilled hydraulic oil to asphalt. | No | No | No | No |
| 2010-03-03 | 3340 NW St Helens | Transformer | 1.5 | Non-detect | A transformer fire leaked oil onto soil, asphalt and railroad track. Lab analysis of oil did not detect PCBs. | No | No | No | No |
| 2010-06-02 | Eastbound off ramp at Greeley and Going Ave | Transformer | 2 | <1 | A fallen tree caused a pole-mount transformer to spill oil. Sticker indicated PCBs of less than 1 ppm. | No | No | No | No |
| 2010-12-11 | 4555 North Channel | Transformer | 1 | 128 | PGE observed a small stain under a pad mount transformer during an equipment change out. | No | No | No | No |

Exhibit A-3: PGE Total Distribution Network Equipment and Related Spills and Releases within the PGE Distribution Network Area Boundary 1979–September 2020

| Spill Date | Street Address | Spill Equipment Type | Quantity Spilled (gallons) ¹ | PCB Content of Spill (ppm) ² | Spill Description | Overwater Spill | Oil Entered Storm Drain | PCB Content Unknown, Non-PCB, or < 50 ppm | Quantity Spilled Unknown |
|------------|----------------------------|----------------------|---|---|--|-----------------|-------------------------|---|--------------------------|
| 2011-11-02 | 2515 NW Nicolai | Transformer | 50 | 17 | A public vehicle hit a power pole causing three pole-mount transformers to fall (Company numbers 1634, 1635, & 1636). Transformer company number 1636 did not spill oil. This record is for one transformer (Company number 1634) which spilled all of its contents onto asphalt and into filtered catch basin at Calbag Metals. PGE did not observe oil in the downgradient storm drain. | No | No | No | No |
| 2011-11-02 | 2515 NW Nicolai | Transformer | 25 | 13 | A public vehicle hit a power pole causing three pole-mount transformers to fall (Company numbers 1634, 1635, & 1636). Transformer company number 1636 did not spill oil. This record is for one transformer (Company number 1635) which spilled half of its contents onto asphalt and into filtered catch basin at Calbag Metals. PGE did not observe oil in the downgradient storm drain. | No | No | No | No |
| 2011-11-03 | 7540 NW St Helens Rd | Transformer | 1 | 4 | An equipment malfunction caused a pole-mount transformer to leak onto soil and gravel. PGE personnel cleaned up spill by removing 2 cubic feet of soil. | No | No | No | No |
| 2012-07-24 | 2420 NW 31ST | Transformer | 30 | 11 | Transformer malfunction spilled oil to soil, gravel, and asphalt. | No | No | No | No |
| 2013-01-14 | 4810 N Lagoon Ave | Transformer | 5 | <1 | Vehicle hit and damaged pad-mount transformer. About 4 square feet of concrete was affected. The spill crew responded and cleanup was completed the same day. Less than 1 ppm. | No | No | No | No |
| 2013-04-18 | 615 NW or SW Naito Pkwy | Transformer | 0.125 | <1 | Release was confined to a concrete vault. Spill response completed cleanup the same day. Less than 1 ppm. | No | No | No | No |
| 2013-04-29 | 5115 N Lagoon | Transformer | 2 | <1 | Transformer malfunction caused a release to soil and asphalt. Approximately 20 square feet of soil and asphalt were affected. Complete cleanup had to wait until scheduled power down, on 5/11/2013. 3 cubic feet of soil removed, asphalt cleaned. Less than 1 ppm. | No | No | No | No |
| 2013-05-29 | 6834 NW St Helens Rd | Transformer (3) | 44 | <1 | Three pole-mount transformers were damaged by weather/tree fall, which resulted in a release to soil and asphalt. Lab analysis of oil did not detect PCBs. | No | No | No | No |
| 2013-05-31 | 6834 NW St Helens (Hwy 30) | Transformer (3) | 1 | <1 | Vegetation impacted by three pole-mount transformers damaged by weather/tree fall on 5/29/13. | No | No | No | No |
| 2013-09-04 | NW Saltzman Rd & Hwy 30 | Transformer | 3 | Non-detect | Transformer malfunction caused oil spill that reached soil/gravel and asphalt, but not a storm drain. Lab analysis of oil did not detect PCBs. | No | No | No | No |
| 2015-07-06 | 11080 NW St Helens Rd | Transformer (2) | 25 | <1 | Approximately 300 sq. feet of asphalt was affected. Less than 1 ppm. | No | No | No | No |
| 2015-08-07 | 7900 NW Yeon Ave | Transformer (2) | 3 | 29 | Vehicle hit pole during dry weather. Spill response completed cleanup the same day. | No | No | No | No |
| 2015-08-22 | 11820 NW St Helens Rd | Transformer | 1 | <1 | Less than 1 ppm. | No | No | No | No |
| 2016-02-10 | 4800 NW Front Ave | Transformer | 2 | <1 | Less than 1 ppm. | No | No | No | No |
| 2018-06-17 | 6161 NW 61st | Transformer (3) | 80 | <1 | A storm caused a pole to fall and two of three transformers spilled their contents onto asphalt and into a storm drain. | No | Yes | No | No |
| 2018-07-12 | 9442 N Ramsey Blvd | Transformer | 2 | <1 | Less than 1 ppm. | No | No | No | No |
| 2019-02-15 | 3627 N. Anchor Street | Transformer | 0 | <1 | Vehicle hit transformer pad and started a fire. Approximately 2 cubic feet of soot-impacted soil was removed. | No | No | No | No |

Exhibit A-3: PGE Total Distribution Network Equipment and Related Spills and Releases within the PGE Distribution Network Area Boundary 1979–September 2020

| Spill Date | Street Address | Spill Equipment Type | Quantity Spilled (gallons) ¹ | PCB Content of Spill (ppm) ² | Spill Description | Overwater Spill | Oil Entered Storm Drain | PCB Content Unknown, Non-PCB, or < 50 ppm | Quantity Spilled Unknown |
|------------|----------------------|----------------------|---|---|---|-----------------|-------------------------|---|--------------------------|
| 2019-05-24 | 12005 N. Burgard Way | Transformer (3) | 80 | <1 | Transformer pole fell due to rotten wood, resulting in a fire and a release of 80 gallons of transformer oil from three pole-mounted transformers. | No | No | No | No |
| 2020-01-12 | Not provided | Regulator | 110 | <1 | Electrical fault caused a regulator to rupture and release oil onto soil and gravel. Soil and gravel removal, soil sampling, and backfill was completed on 1/14/2020. | No | No | No | No |
| 2020-02-26 | 9040 N Burgard Way | Transformer | 5 | <1 | Car hit pole causing the attached transformer to spill oil into storm drains. Oil was cleaned and vacuumed from the impacted storm drains. | No | Yes | No | No |
| 2020-05-31 | 4456 NW Yeon Ave | Transformer | 1 | <91 | Transformer released approximately 1 gallon of oil containing < 91 ppm PCB (9/23/2016 oil sample). | No | No | Yes | No |

Appendix A – Portland Terminal Railroad Company

The properties listed below are identified for Portland Terminal Railroad Company for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number (Tax Lot number) and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address. The attached map should be considered part of this Appendix A. The table and figure, combined, provide a comprehensive picture of the released properties.


| Site ID No. | Street Address | County Tax Parcel ID | Assessor Property ID | State ID | Notes |
|-------------|--|--|--|--|------------------|
| 197 | 3500 NW Yeon Ave. | R941190180 | R315812 | 1N1E19A-01900 | See attached map |
| | | R941190170 | R315811 | 1N1E19DA-00200 | |
| | | R941190010 | R315800 | 1N1E19DA-00100 | |
| | | R941201230 | R315980 | 1N1E20-01300 | |
| | | R941200040 | R315899 | 1N1E20 -01400 | |
| | | R941201250 | R315982 | 1N1E20 -01200 | |
| | | R941190580 | R315841 | 1N1E19B-01300 | |
| | | R941190560 | R315839 | 1N1E19A-02000 | |
| | | R941190040 | R315801 | 1N1E19DA-00300 | |
| | | R941190600 | R315843 | 1N1E19DA-00400 | |
| | | R941190610 | R315844 | 1N1E19DA-00500 | |
| | | R941190590 | R315842 | 1N1E19DA-00600 | |
| | | R941190570 | R315840 | 1N1E19DA-00700 | |
| | | R941190660 | R315847 | 1N1E19DA-00800 | |
| | | R941190670 | R315848 | 1N1E19DA-00900 | |
| | | R941190830 | R315861 | 1N1E19DA-01100 | |
| | | R941190350 | R315820 | 1N1E19DA-01000 | |
| | | R941290680 | R316412 | 1N1E29AA-01700 | |
| | | R941290730 | R316419 | 1N1E29AA-01300 | |
| | | R941292130 | R316531 | 1N1E29AA-01800 | |
| 306A | 1111 NW Naito Parkway *NW Naito Parkway | R649812740 R649812730 | R508395 R508394 | 1N1E34BB -00502 1N1E34BD -00805 | See attached map |
| 306B | 901 NW Naito Parkway 615 NW NAITO PKWY 945 NW Naito Parkway | R850600300 R850600250 R850600150 | R518301 R291745 R291743 | 1N1E34BD -00806 1N1E34BD -00804 1N1E34BD -00802 | See attached map |
| 306C | 800 NW Sixth Avenue NW COR/ 9TH & NW NAITO NW 2 nd Avenue NW 9 th Ave 510 NW 3rd NW Station Way 800 WI/ NW 6TH AVE 800 WI/ NW 6TH AVE | R180237200 R180220230 R180236410 R180217550 R180236460 R793100300 R180237360 R180237370 | R141472 R141023 R141444 R140959 R141452 R533588 R141480 R636518 | 1N1E34BD -01200 1N1E34BB -00700 1N1E34BB -00800 1N1E34BB -01100 1N1E34BD -00600 1N1E34BB -01306 1N1E34BD -02300 1N1E34BD -02301 | See attached map |

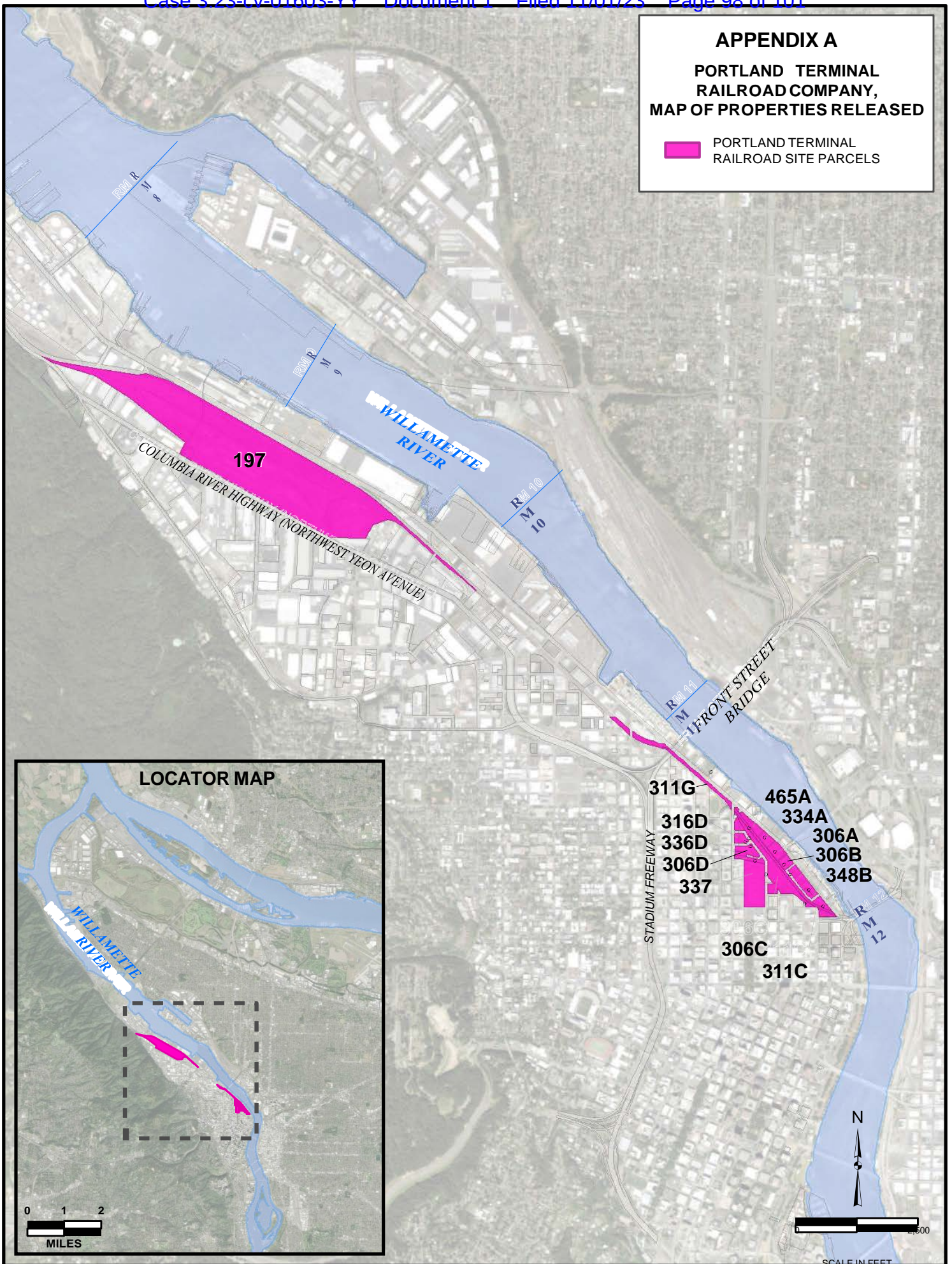
| Site ID No. | Street Address | County Tax Parcel ID | Assessor Property ID | State ID | Notes |
|-------------|---|--|---|--|--|
| 306D | 1020 – 1300 NW 9 th Avenue | R793100100 R793100150 R793100250 R793100350 R793100400 | R533584 R533585 R533587 R533589 R533590 | 1N1E34BB-01302 1N1E34BB-01303 1N1E34BB-01305 1N1E34BB-01307 1N1E34BB-01308 | See attached map |
| 311C | Union Station Track 5 | R180236400 R180217520 R180217530 R180236470 R180236420 R180237210 | R141443 R140955 R140956 R141455 R141447 R140959 | 1N1E34BB-00900 1N1E34BB-01000 1N1E34BB-01200 1N1E34BD-00700 1N1E34BD-01000 1N1E34BD-01100 | See attached map |
| 311G | Union Station Track 5 | R883801700 R180222140 R883801800 R883801900 R180220310 R180222110 | | | |
| 316D | 1020 – 1300 NW 9 th Avenue (1150 NW 9 th Avenue) | R793100200 | R533586 | 1N1E34BB-01304 | See attached map |
| 334A | 1207 NW Naito Parkway | R649812750 | R508396 | 1N1E34BB 00501 | See attached map |
| 336D | 1020 – 1300 NW 9 th Avenue 1020 NW 9 th | R793100050 | R533583 | 1N1E34BB-01301 | See attached map |
| 337 | 715 NW Hoyt Street 715 W/NW Hoyt Street NWC/NW Hoyt & NW Broadway NEC of Hoyt & NW 9th NW 9 th Ave. NW 9 th Ave. NW Hoyt Street NW Broadway NW 9 th Ave. NW Broadway SEC of Lovejoy & NW 9th NW Lovejoy Street SWC/Lovejoy & NW Broadway | R180210240 R180210300 | R140726 R140728-INACTIVE ¹ R709060 R709059 R709062 R709061 R709063 R709064 R709065 R709066 R709067 R709068 R709069 | 1N1E34BC-00100 1N1E34BC-00200 1N1E34BC-00102 1N1E34BC-00101 1N1E34BC-00104 1N1E34BC-00103 1N1E34BC-00105 1N1E34BC-00106 1N1E34BC-00107 1N1E34BC-00108 1N1E34BC-00109 1N1E34BC-00110 1N1E34BC-00111 | See attached map (Created from -200) (Created from -200) (Created from -200) (Created from -200) (Created from -200) (Created from -200) (Created from -200) (Created from -200) (Created from -200) (Created from -200) (Created from -200) (Created from -200) |
| 348B | 901 NW Naito Parkway 707-729 NW Naito Pkway 731-779 NW Naito Pkway | R850600350 R850600450 R850600400 | R518302 R518304 R518303 | 1N1E34BD-00807 1N1E34BD-00809 1N1E34BD-00808 | See attached map |
| 465A | 1207 NW Naito Parkway | R850600050 | R291740 | 1N1E34BB-00600 | See attached map |

¹ In 2020, Tax Lot 1N1E34BC-00200 was merged into R140726. In 2021, new parcels R709060 – R709069 were created by separating out smaller parcels from Lot 200.

APPENDIX A

PORTLAND TERMINAL RAILROAD COMPANY, MAP OF PROPERTIES RELEASED

 PORTLAND TERMINAL
RAILROAD SITE PARCELS



Appendix A – Schnitzer Steel Industries, Inc.

The properties listed below are identified for Schnitzer Steel Industries, Inc. for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

| Site ID number | Street Address | County Tax Parcel ID |
|----------------|--|---|
| 60 | 9040 N. Burgard Way | R971350740 |
| 61 | 12005 N. Burgard Road | R971350710, R118300200 |
| 141 | 6529 NW Front Ave. | R961130330 |
| 157 | 5555 N. Channel Ave. | R649840290, R941180390, R941201320 |
| 158 | 5851 N. Lagoon Ave. | R941170730, R941170890 |
| 186 | 4250 NW Front Ave. (former address of relevant portion of Site 186, all of which is now addressed as 4700 NW Front Ave.) | R941200570, R941191240, R941200500, R941191190 |
| 203 | 3200-3340 NW Yeon Ave., 3340-3342 NW 26 th Ave. | R649701500, R941291430, R649701480, R934690010, R941280990, R941280950, R649701460 |
| 204 | 3721 NW Front Ave. | R941200220 |
| 205 | 3641/3683 NW Front Ave. | R941200980 |
| 501 | 3333 NW 35 th Ave. | R941290710, R941291550, R941290720 |
| 607 | 12005 N. Burgard Road | R118300100 |

Appendix A – Siltronic Corporation

The properties listed below are identified for Siltronic Corporation for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

| Site ID number | Street Address | County Tax Parcel ID/Alternative Acct. No. |
|-----------------------|-----------------------|---|
| 125 | 7200 NW Front Ave. | R324183/R961130010 |
| 125 | 7200 NW Front Ave. | R324219/R961130480 |

Appendix A – Sulzer Pumps (US) Inc.

The properties listed below are identified for **Sulzer Pumps (US) Inc.** for purposes of this Complaint. Properties are identified by current tax parcel number from the Multnomah County Department of County Management Assessment and Taxation. Where available, the Site ID number and street address also are listed for each tax parcel, in order to provide additional context and reference. However, unless otherwise indicated below, the property boundaries are based on the current tax parcel number, not the Site number or the street address.

| Site ID number | Street Address | County Tax Parcel ID |
|----------------|-------------------------------|----------------------|
| 220 | 2800 NW Front Ave. | R941280900 |
| 221 | 2700 NW Front Ave. | R941280300 |
| 576 | 2551 NW 30 th Ave. | R841080010 |